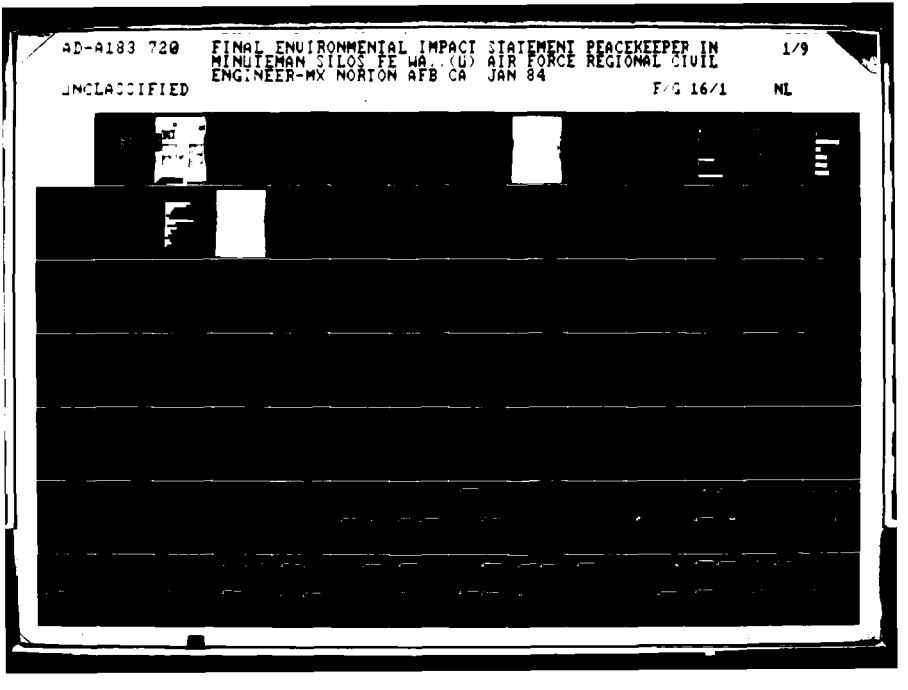
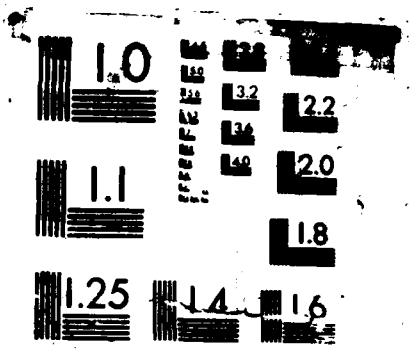
AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 1/9

UNCLASSIFIED F/G 16/1 NL





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OMB No. 0704-0188

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2b. DECLASSIFICATION / DOWNGRADING SCHEDULE	
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12. PERSONAL AUTHOR(S)
US AIR FORCE

13a. TYPE OF REPORT	13b. TIME COVERED	14. DATE OF REPORT (Year, Month, Day)	15. PAGE COUNT
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17. COSATI CODES			18. SUBJECT TERMS (Continue on reverse if necessary and identify by block number)
FIELD	GROUP	SUB-GROUP	
16	04		
16	04		

19. ABSTRACT (Continue on reverse if necessary and identify by block number)

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Volume ~~II~~ of the Final EIS contains the Public Comments on the Draft EIS, the issues raised, and the answers to those issues [illegible] Wyoming [illegible] statements, [illegible]

20. DISTRIBUTION / AVAILABILITY OF ABSTRACT ☒ UNCLASSIFIED/UNLIMITED ☐ SAME AS RPT. ☐ DTIC USERS	21. ABSTRACT SECURITY CLASSIFICATION
22a. NAME OF RESPONSIBLE INDIVIDUAL Lt Col Peter Walsh, USAF	22b. TELEPHONE (Include Area Code) (714) 382-4891 22c. OFFICE SYMBOL DEV

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PEACEKEEPER IN MINUTEMAN SILOS
FINAL ENVIRONMENTAL IMPACT STATEMENT

JANUARY 1984

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NTIS CRA&I
DTIC TAB
Unannounced
Justification
By
Distribution/
Availability Codes
Dist | Avail and/or Special
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7.2.12	Cultural and Paleontological Resources	7.2.12-1
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5.0 Introduction

The Council on Environmental Quality (CEQ) regulations require that "after preparing a draft environmental impact statement and before preparing a final environmental impact statement the agency shall:

1) Obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved or which is authorized to develop and enforce environmental standards.

2) Request the comments of:
   i) Appropriate State and local agencies which are authorized to develop and enforce environmental standards;
   ii) Indian tribes, when the effects may be on a reservation; and
   iii) Any agency which has requested that it receive statements on actions of the kind proposed.

3) Request comments from the applicant, if any.

4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected."

The regulations further require that "an agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively," and shall respond to those comments in the final document.

In compliance with these regulations, the Air Force released the Peacekeeper in Minuteman Silos Draft Environmental Impact Statement (DEIS) for a 45-day public review and comment period on October 14, 1983. Copies of the document were sent to agencies, organizations, and individuals as required, and as documented in Section 4.0, and were made available to the public upon request.

This volume of the Peacekeeper in Minuteman Silos Final Environmental Impact Statement (FEIS) contains an overview of the public comment management process, a listing of all respondents, copies of all comment documents received, and a catalog of all issues identified in the documents and the responses to the issues.

5.1 Public Review of DEIS

The public review and comment period for the DEIS began October 14, 1983 with publication of the Notice of Availability in the Federal Register, and ended on November 28, 1983. During this 45-day review period, public comments on the DEIS were solicited. Written comments were submitted to the Air Force Regional Civil Engineer Ballistic Missile Support Office at Norton Air Force Base, California. Verbal and written comments were received at seven public hearings held in the study area between November 1 and November 4, 1983. As set forth by the CEQ regulations, these hearings were held at least 15 days following availability of the DEIS. The hearings were held in Pine Bluffs, Cheyenne (2 hearings), Torrington, and Wheatland, Wyoming; and Harrisburg and Kimball, Nebraska.

In addition to the DEIS, 13 draft environmental planning technical reports (EPTRs) were prepared. These documents were prepared as support documents to the DEIS. They include a 3-volume Draft Jurisdictional EPTR and separate volumes for the 12 environmental resources addressed in the DEIS.

The Draft Jurisdictional EPTR was prepared in response to a Memorandum of Agreement among the Department of Defense and the states of Nebraska and Wyoming. In the Memorandum of Agreement, the Department of Defense agreed to complete the Draft Jurisdictional EPTR in response to certain requirements of the Wyoming Industrial Siting Act. The document describes various socioeconomic impacts of the proposed project within specific jurisdictions of Nebraska and Wyoming. The Draft Jurisdictional EPTR is not a requirement of the National Environmental Policy Act as is the DEIS.

The Draft Jurisdictional EPTR was made available for public review during the same time period set for the DEIS. The document was sent to responsible agencies within the study area to solicit their comments. The document was also made available for public review at public libraries within the study area and was made available upon request from the Air Force Regional Civil Engineer Ballistic Missile Support Office at Norton Air Force Base, California.

The 12 draft EPTRs were prepared for the environmental resources addressed in the DEIS. The documents contain detailed information on data collection and analyses, methodologies employed, and modeling results used to determine the project impacts which were presented in the DEIS. These EPTRs were distributed to responsible agencies in the study area with interest in a particular resource for their review and comment. They were also made available for public review at public libraries within the study area, and were also available upon request from the Air Force Regional Civil Engineer Ballistic Missile Support Office.

5.2 Public Comments

5.2.1 Receipt of Comments

During the 45-day public comment and review period, public comments on the DEIS, draft Jurisdictional EPTR, and the draft EPTRs were received. The comments included testimony at the seven public hearings, memoranda, letters, government agency forms, written statements submitted at the public hearings, and one telephone call. Each of these are referred to as documents and all were given the same consideration in the review and analysis process.

A total of 405 documents was received. Documents received by state, city, and the type of affiliation of the documents' authors are shown on Figures 5.2.1-1 through 5.2.1-3.

5.2.2 Process Used in Reviewing and Responding to Comments

Comments were analyzed and responses were prepared using a public comment management process. The purpose of this process was to analyze each comment, formulate a response, and incorporate corrections or necessary additional studies into the FEIS.

All documents were assigned a document number for purposes of identification and information tracking. Original documents were microfilmed, photocopied, and archived.

After document numbers were assigned, information concerning the source and author of the document was entered into a data base. This information included the name and type of organization, and the author's name, title, and address. Section 6.1 contains a listing of all respondents by type of affiliation: federal, state, county, city and municipal, organizations, and individuals. For each level of government, public officials are listed first, followed by an alphabetical listing by agency. Organizations are listed alphabetically, and individuals are listed alphabetically by last name.

FIGURE 5.2.1-1 DOCUMENTS RECEIVED BY STATE

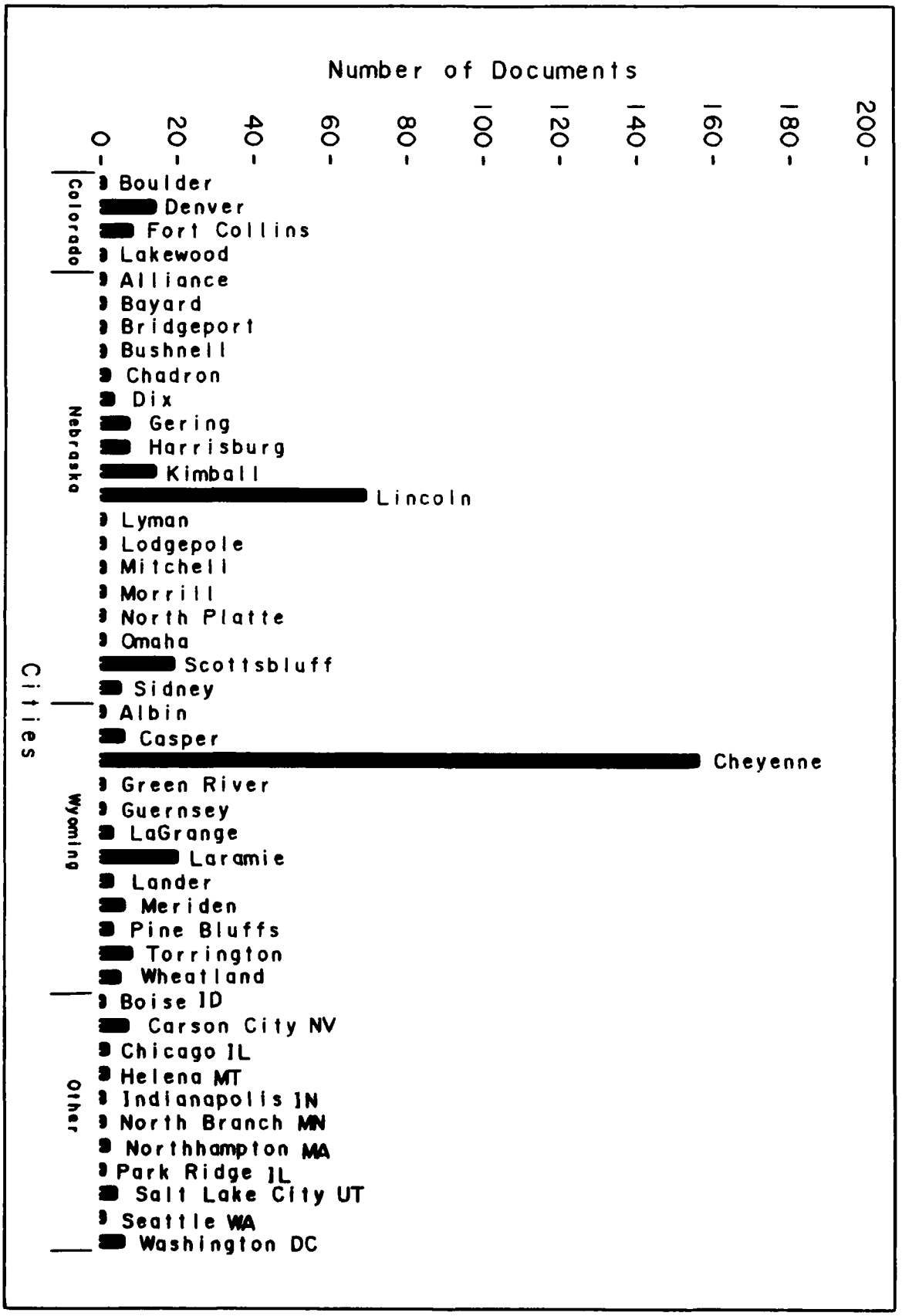


FIGURE 5.2.1-2 DOCUMENTS RECEIVED BY CITY

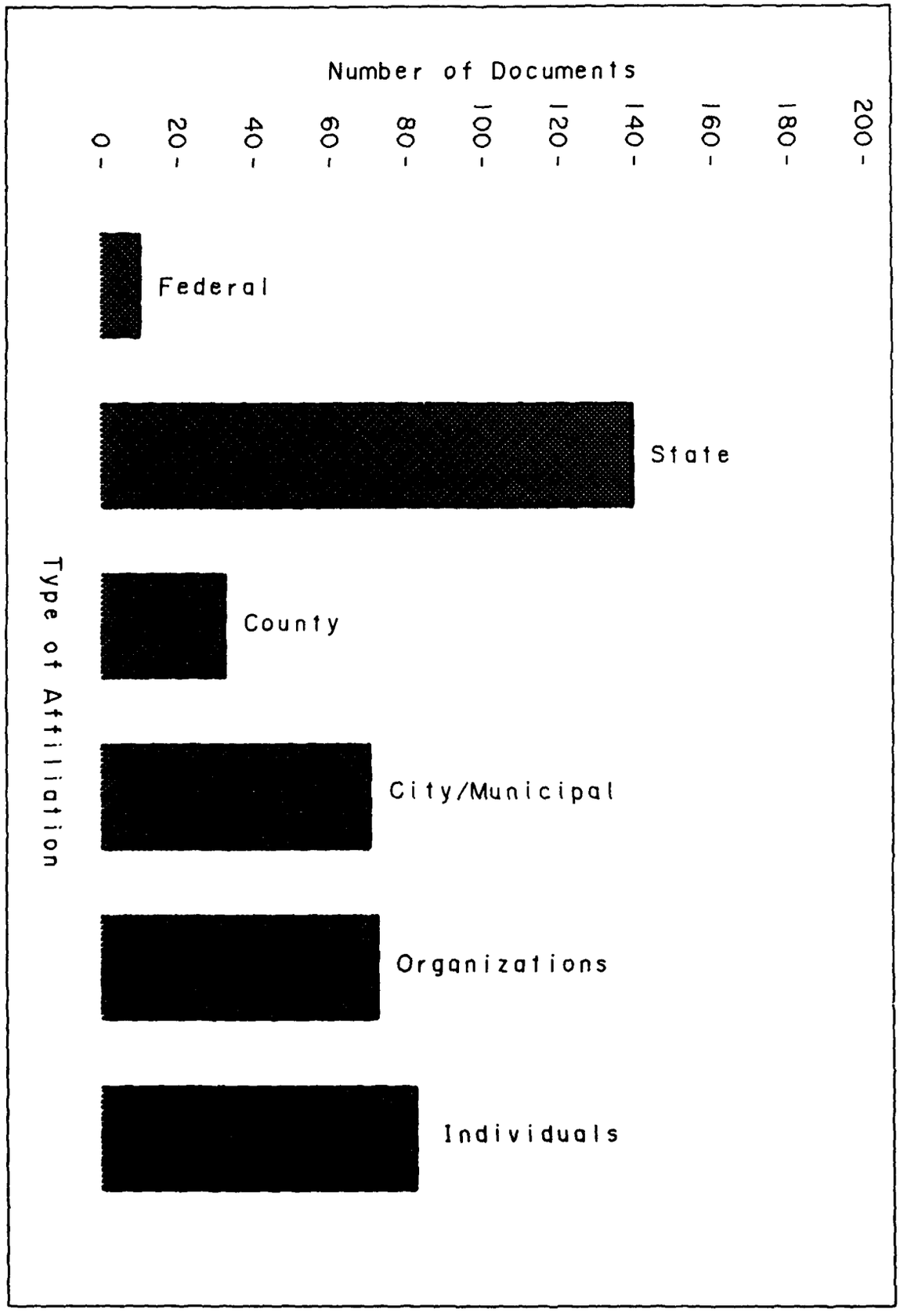


FIGURE 5.2.1-3 DOCUMENTS BY TYPE OF AFFILIATION

Each document was reviewed and the comments were analyzed to identify the issues addressed. The identified issues were assigned to 1 of 20 categories which correspond to the information contained in the DEIS. Generally, the categories address EIS process issues, Air Force policy issues, and each of the environmental resources analyzed in the DEIS. Each issue was assigned an issue code number and all comments addressing the same issue received the same issue code number. From all documents received during the public review period, 2,608 issues were identified. These were aggregated into 1,488 different issues. The total number of issues identified are shown by issue category on Figure 5.2.2-1. This process of aggregating comments is in accordance with Council on Environmental Quality regulation 40 C.F.R. 1503.4(b) which allows comments of a similar nature to be grouped for a common response.

Following issue identification, issues were grouped by resource and distributed to the appropriate resource personnel for preparation of the issue and response text. The issue text was prepared for each issue code number by professional staff. After the issue text was prepared, a response was developed. A catalog of all issue and response text and the corresponding issue code numbers is contained in Section 7.0. The issue code numbers are shown on each document for each issue that was identified. Reproductions of all documents postmarked prior to November 28, 1983 can be found in Section 6.2. Documents postmarked after the November 28, 1983 comment period deadline can be found in Section 6.3.

5.3 Preparation of Final Environmental Impact Statement

The review of public comments served as one element of preparing the FEIS. Many issues addressed during the public comment period led to the conduct of further analysis, reanalysis, or verification of data. In accordance with the Council on Environmental Quality regulations, all comments have received responses. All comments received and the responses to each are included as part of the FEIS.

5.4 Issue and Response Location

This volume has been prepared to allow the reader to easily locate the comments and the Air Force's response. To accomplish this, the reader should use the following steps as a guideline:

Step 1. Locate the agency, name, and document number in Section 6.1.

Step 2. Locate the document in Section 6.2 by using the document number. If the document is identified as public hearing testimony, refer to the page number indicated.

Step 3. Locate each issue code number(s) on the document.

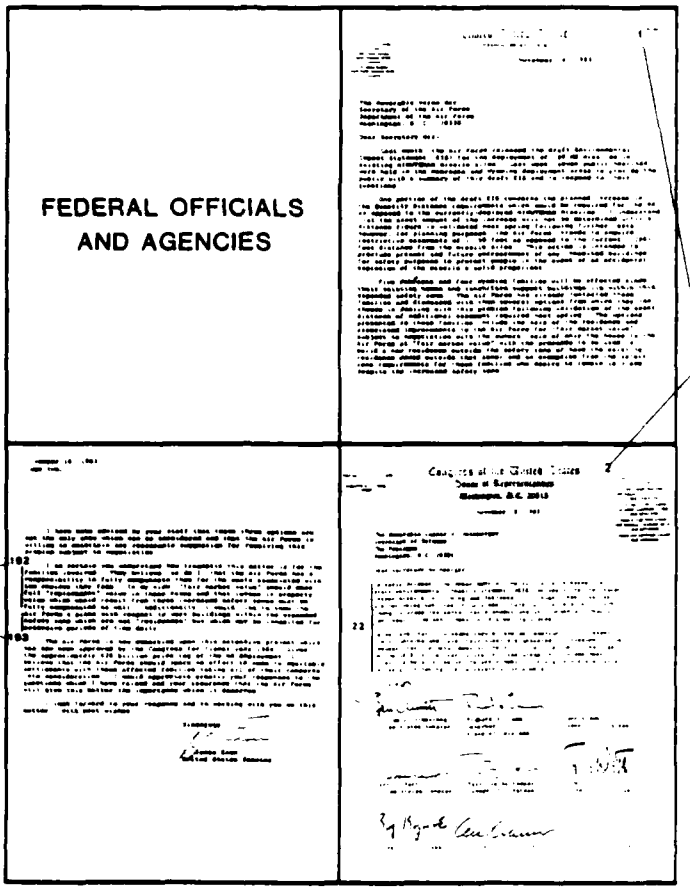
Step 4. Locate the corresponding issue and response text in Section 7.0.

The following illustrations demonstrate how Senator Exon's comment would be traced.

Step 1 (Section 6.1)

FEDERAL ← Type of Affiliation

DOCUMENT NUMBER: 1 ← Document Number
U.S. Senate ← Organization/Affiliation
Hon. J. James Exon ← Author
United States Senator ← Author's Title
Washington D.C. ← City, State



Step 4 (Section 7.0)

ISSUE RESPONSE TEXT DATA

ISSUE CODE	ISSUE TEXT	RESPONSE TEXT
192	It is the Air Force s responsibility to fully compensate dislocated families They should receive full replacement value and be compensated for losses in property value due to increased safety zones	The Air Force will pay the fair market value of the existing facilities. The cost of the replace ment facilities will be determined by type and size of facilities the rancher wishes to con struct; however, the payment for the existing facilities should be adequate to provide equally useable facilities. The cost of relocating the people and the ranching business will be mitigated by payment of relocation benefits which are separate from and in addition to the payment for the easement and the facilities
193	How will the Air Force treat work buildings that are inhabited for extensive periods of time each day and lie inside the Quantity Distance zones?	The Air Force will have to review the facts in each case to determine which of the buildings are, under the terms of the regulations, inhabited buildings. If the buildings are determined to be inhabited buildings, then the options available to the Air Force are to purchase the building, relocate the building or obtain an exemption from the regulation requirement. The Air Force is presently aware of only nine such situations among the 100 selected launch facilities

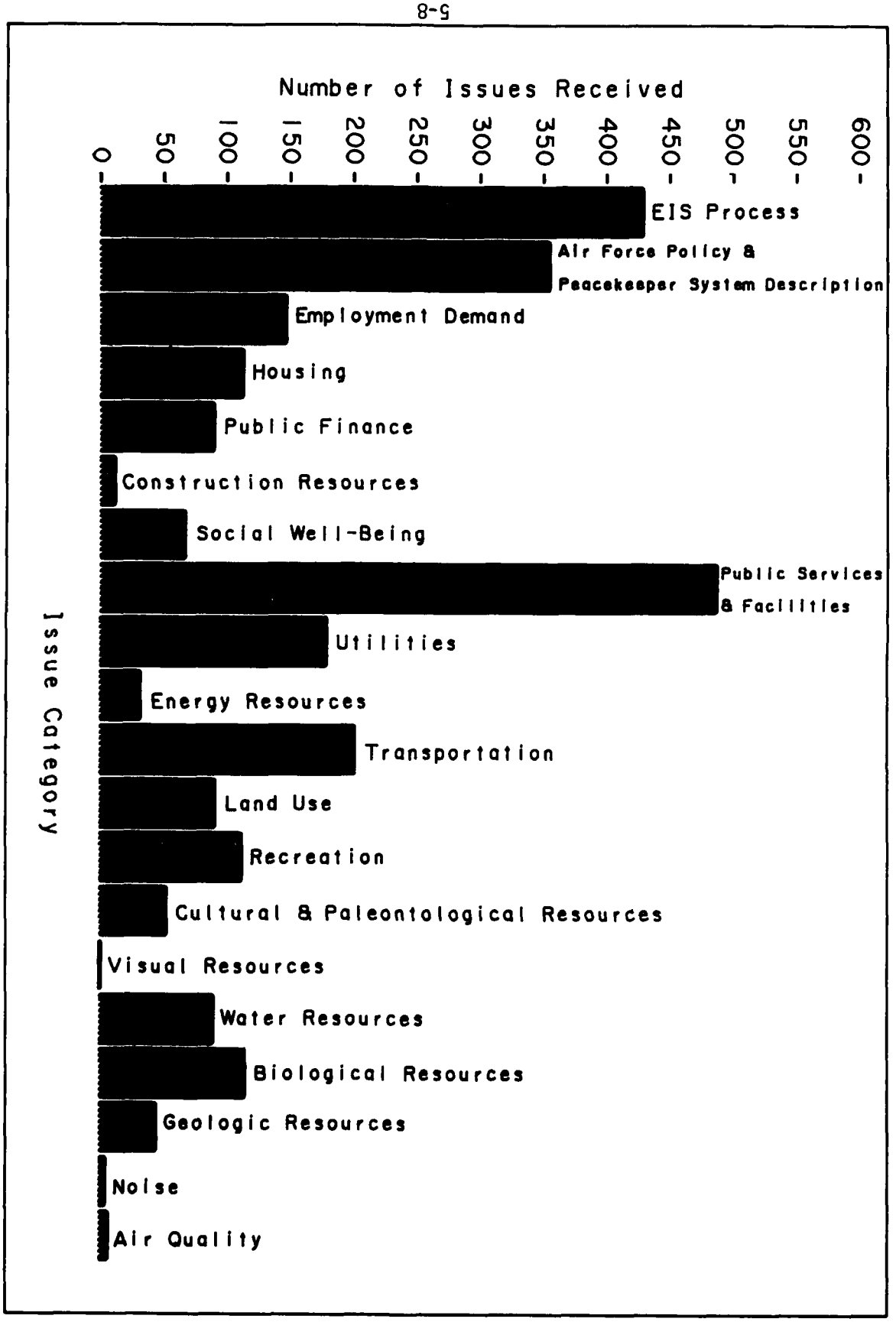


FIGURE 5.2.2-1 ISSUES RECEIVED BY ISSUE CATEGORY

6.0 PUBLIC COMMENTS

6.1 List of Respondents

Following is a list of all respondents who submitted comments during the public review and comment period. The list includes the document number, author's affiliation, name, title, city, and state. Respondents are grouped by type of affiliation: federal, state, county, city and municipal, organizations, and individuals, and listed by document number. Each of these respondents was sent a copy of the FEIS as described in Section 4.5.

FEDERAL

DOCUMENT NUMBER: 1
U.S. Senate
Hon. J. James Exon
United States Senator
Washington D.C.

DOCUMENT NUMBER: 2
U.S. Senate
Hon. Gary W. Hart
United States Senator
Hon. William L. Armstrong
United States Senator
U.S. House of Representatives
Hon. Patricia Schroeder
Member of Congress
Hon. Timothy E. Wirth
Member of Congress
Hon. Ken Kramer
Member of Congress
Hon. Ray Kogovsek
Member of Congress
Hon. Hank Brown
Member of Congress
Hon. Dan Schaefer
Member of Congress
Washington D.C.
State of Colorado
Governor Richard D. Lamm
Denver CO

DOCUMENT NUMBER: 3
U.S. House of Representatives
Hon. Virginia Smith
Member of Congress
Washington D.C.

DOCUMENT NUMBER: 4
Federal Emergency Management Agency
Alton D. Cook
Director, Region VIII
Denver CO

DOCUMENT NUMBER: 5
U.S. Department of Agriculture
Forest Service
Craig W. Rupp
Regional Forester, Rocky Mountain Region
Lakewood CO

FEDERAL

DOCUMENT NUMBER: 6
U.S. Dept. of Housing & Urban Dev.
Office of Community Plg. & Dev.
Robert Matuschek
Director, Region VIII
Denver CO

DOCUMENT NUMBER: 7
U.S. Dept. of Transportation
Federal Aviation Administration
Dennis G. Ossenkop
Senior Environmental Planner
Seattle WA

DOCUMENT NUMBER: 8
U.S. Dept. of Transportation
Federal Highway Administration
Office of Plg. & Program Dev.
F.S. Allison
Director, Region VIII
Denver CO

DOCUMENT NUMBER: 9
U.S. Dept. of the Interior
Office of the Secretary
Bruce Blanchard
Director-Envir. Project Review
Washington D.C.

DOCUMENT NUMBER: 10
U.S. Environmental Protection Agency
John G. Welles
Administrator, Region VIII
Denver CO

STATE

DOCUMENT NUMBER: 11
State of Colorado
Governor Richard D. Lamm
Denver CO

DOCUMENT NUMBER: 12
State of Nebraska
Governor Robert Kerrey
Lincoln NE

DOCUMENT NUMBER: 13
State of Wyoming
Governor Ed Herschler
Cheyenne WY

STATE

DOCUMENT NUMBER: 14
Nebraska Secretary of State
Allen J. Beermann
Secretary of State
Lincoln NE

DOCUMENT NUMBER: 15
Nebraska Secretary of State
Allen J. Beermann
Secretary of State
Lincoln NE

DOCUMENT NUMBER: 16
Nebraska State Legislature
Elroy Hefner
State Senator
Lincoln NE

DOCUMENT NUMBER: 17
Nebraska State Legislature
Marge Higgins
State Senator
Lincoln NE

DOCUMENT NUMBER: 18
Nebraska State Legislature
Ray E. Lundy
State Senator
Lincoln NE

DOCUMENT NUMBER: 19
Nebraska State Legislature
Shirley Marsh
State Senator
Lincoln NE

DOCUMENT NUMBER: 20
Nebraska State Legislature
Howard Peterson
State Senator
Lincoln NE

DOCUMENT NUMBER: 21
Nebraska State Legislature
Lee Rupp
State Senator
Lincoln NE

STATE

DOCUMENT NUMBER: 22
Wyoming Dept. of Education
Lynn Simons
State Superintendent
Cheyenne WY

DOCUMENT NUMBER: 23
Wyoming Dept. of Education
Lynn Simons
State Superintendent
Cheyenne WY

DOCUMENT NUMBER: 24
Wyoming Supreme Court
John J. Rooney
Chief Justice
Cheyenne WY

DOCUMENT NUMBER: 25
Wyoming Supreme Court
John J. Rooney
Chief Justice
Cheyenne WY

DOCUMENT NUMBER: 26
Chadron State College
Dr. Ronald R. Weedon
Professor of Biology
Chadron NE

DOCUMENT NUMBER: 27
Colorado Historical Society
Barbara Sudler
State Historic Preservation Officer
Denver CO

DOCUMENT NUMBER: 28
Nebraska Adjutant General-Military Dept.
State Civil Defense Agency
Francis A. Laden
Assistant Director
Lincoln NE

DOCUMENT NUMBER: 29
Nebraska Adjutant General-Military Dept.
State Civil Defense Agency
Larry E. Nedrow
Plans and Programs Officer
Lincoln NE

STATE

DOCUMENT NUMBER: 30
Nebraska Arts Council
Robin Tryloff
Executive Director
Omaha NE

DOCUMENT NUMBER: 31
Nebraska Attorney General
John Boehm
Assistant Attorney General
Lincoln NE

DOCUMENT NUMBER: 32
Nebraska Auditor of Public Accounts
Ray A.C. Johnson
State Auditor
Lincoln NE

DOCUMENT NUMBER: 33
Nebraska Brand Committee
Christy Strong
Clerk-Typist
Gering NE

DOCUMENT NUMBER: 34
Nebraska Comm. on the Status of Women
Jean O'Hara
Executive Director
Lincoln NE

DOCUMENT NUMBER: 35
Nebraska Crime Commission
Director's Office
Merritt C. Green
Acting Director
Lincoln NE

DOCUMENT NUMBER: 36
Nebraska Crime Commission
Director's Office
Merritt C. Green
Acting Director
Lincoln NE

DOCUMENT NUMBER: 37
Nebraska Dept. of Admin. Services
Budget Division
Larry Bare
State Budget Administrator
Lincoln NE

STATE

DOCUMENT NUMBER: 38
Nebraska Dept. of Aeronautics
John R. Auer
Director
Lincoln NE

DOCUMENT NUMBER: 39
Nebraska Dept. of Aeronautics
John R. Auer
Director
Lincoln NE

DOCUMENT NUMBER: 40
Nebraska Dept. of Agriculture
Robert Raun
Director
Lincoln NE

DOCUMENT NUMBER: 41
Nebraska Dept. of Correctional Services
Office of the Planning Administrator
Dan Griepentrog
Planning Administrator
Lincoln NE

DOCUMENT NUMBER: 42
Nebraska Dept. of Education
Joe E. Lutjeharms
Commissioner
Lincoln NE

DOCUMENT NUMBER: 43
Nebraska Dept. of Environmental Control
George H. Ludwig
Acting Director
U. Gale Hutton
Water and Waste Management Specialist
Lincoln NE

DOCUMENT NUMBER: 44
Nebraska Dept. of Labor
Division of Employment
Larry Fitzgibbon
Job Service Manager
Scottsbluff NE

DOCUMENT NUMBER: 45
Nebraska Dept. of Labor
Division of Employment
Larry Fitzgibbon
Job Service Manager
Scottsbluff NE

STATE

DOCUMENT NUMBER: 46
Nebraska Dept. of Labor
Division of Employment
Wendell O. Olson
Research and Statistics Chief
Lincoln NE

DOCUMENT NUMBER: 47
Nebraska Dept. of Labor
Division of Employment
Wendell O. Olson
Research and Statistics Chief
Lincoln NE

DOCUMENT NUMBER: 48
Nebraska Dept. of Labor
Division of Job Training
Joseph P. Foster
Director
Lincoln NE

DOCUMENT NUMBER: 49
Nebraska Dept. of Motor Vehicles
Director's Office
William J. Edwards
Deputy Director
Lincoln NE

DOCUMENT NUMBER: 50
Nebraska Dept. of Motor Vehicles
Director's Office
William J. Edwards
Deputy Director
Lincoln NE

DOCUMENT NUMBER: 51
Nebraska Dept. of Public Institutions
Peter Beeson, Ph.D.
Director of Planning
Lincoln NE

DOCUMENT NUMBER: 52
Nebraska Dept. of Roads
Louis E. Lamberty
Director - State Engineer
Lincoln NE

STATE

DOCUMENT NUMBER: 53
Nebraska Dept. of Roads
Louis E. Lamberty
Director - State Engineer
Lincoln NE

DOCUMENT NUMBER: 54
Nebraska Dept. of Social Services
Div. of Research and Statistics
Ginger Goomis
Budget Officer
Lincoln NE

DOCUMENT NUMBER: 55
Nebraska Dept. of Social Services
Div. of Research and Statistics
Ginger Goomis
Budget Officer
Lincoln NE

DOCUMENT NUMBER: 56
Nebraska Dept. of Social Services
Scottsbluff Area Field Office
Margo Gamet
Program and Planning Specialist
Scottsbluff NE

DOCUMENT NUMBER: 57
Nebraska Dept. of Water Resources
Michael Jess
Director
Lincoln NE

DOCUMENT NUMBER: 58
Nebraska Dept. of Water Resources
Michael Jess
Director
Lincoln NE

DOCUMENT NUMBER: 59
Nebraska Dept. on Aging
Helen G. Boosalis
Director
Lincoln NE

DOCUMENT NUMBER: 60
Nebraska Dept. on Aging
Patty Kuehl
Deputy Director
Lincoln NE

STATE

DOCUMENT NUMBER: 61
Nebraska Equal Opportunity Commission
Isabel Grenno
Field Representative
Scottsbluff NE

DOCUMENT NUMBER: 62
Nebraska Game & Parks Commission
Del Whiteley
Division Chief
Lincoln NE

DOCUMENT NUMBER: 63
Nebraska Liquor Control Commission
Herbert J. Duis
Chairman
Lincoln NE

DOCUMENT NUMBER: 64
Nebraska Liquor Control Commission
Terrance D. Micek
Executive Director
Lincoln NE

DOCUMENT NUMBER: 65
Nebraska Mexican American Commission
Rudy Peralez
Executive Director
Lincoln NE

DOCUMENT NUMBER: 66
Nebraska Mexican American Commission
Gloria Reifenrath
Assistant Director
Lincoln NE

DOCUMENT NUMBER: 67
Nebraska Natural Resource Districts
North Platte Natural Resources District
Ronald D. Cacek
District Manager
Gering NE

DOCUMENT NUMBER: 68
Nebraska Natural Resource Districts
South Platte Natural Resources District
Marlan Ferguson
District Manager
Sidney NE

STATE

DOCUMENT NUMBER: 69
Nebraska Natural Resources Commission
Verlon K. Vrana
Planning Division Chief
Lincoln NE

DOCUMENT NUMBER: 70
Nebraska Oil and Gas Conservation Comm.
Paul H. Roberts
Director
Sidney NE

DOCUMENT NUMBER: 71
Nebraska Oil and Gas Conservation Comm.
Paul H. Roberts
Director
Sidney NE

DOCUMENT NUMBER: 72
Nebraska Panhandle Resource Council
Mary Keller
Staff Assistant
Scottsbluff NE

DOCUMENT NUMBER: 73
Nebraska Policy Research Office
Gayle Malmquist
Lincoln NE

DOCUMENT NUMBER: 74
Nebraska Policy Research Office
Gayle Malmquist
Lincoln NE

DOCUMENT NUMBER: 75
Nebraska Policy Research Office
Gayle Malmquist
Lincoln NE

DOCUMENT NUMBER: 76
Nebraska Public Service Commission
Terrence Kubicek
Executive Secretary
Lincoln NE

DOCUMENT NUMBER: 77
Nebraska State College Board
Richard Bringelson
Executive Officer
Lincoln NE

STATE

DOCUMENT NUMBER: 78
Nebraska State Dept. of Health
Housing and Environmental Health
Jack L. Daniel
Division Director
Lincoln NE

DOCUMENT NUMBER: 79
Nebraska State Dept. of Health
Housing and Environmental Health
Jack L. Daniel
Division Director
Lincoln NE

DOCUMENT NUMBER: 80
Nebraska State Dept. of Health
Western Regional Health Department
Gary Gibbons
Administrator
Scottsbluff NE

DOCUMENT NUMBER: 81
Nebraska State Fire Marshall
Wally Barnett, Jr.
State Fire Marshall
Lincoln NE

DOCUMENT NUMBER: 82
Nebraska State Historical Society
Richard E. Jensen
Deputy State Historic Preservation Offr.
Lincoln NE

DOCUMENT NUMBER: 83
Nebraska State Historical Society
Richard E. Jensen
Deputy State Historic Preservation Offr.
Lincoln NE

DOCUMENT NUMBER: 84
Nebraska State Patrol
Lt. Col. J.E. Buist
Assistant Superintendent
Lincoln NE

DOCUMENT NUMBER: 85
Nebraska State Patrol
Lt. Col. J.E. Buist
Assistant Superintendent
Lincoln NE

STATE

DOCUMENT NUMBER: 86
Nebraska State Patrol
Major W.F. Palmer
West Division Commander
North Platte NE

DOCUMENT NUMBER: 87
Nebraska State Probation Administration
Robert Keller
Administrator
Lincoln NE

DOCUMENT NUMBER: 88
Nebraska State Probation Administration
District 10
Daniel Witko
Chief Probation Officer
Gering NE

DOCUMENT NUMBER: 89
Nebraska State Treasurer's Office
Kay Orr
State Treasurer
Lincoln NE

DOCUMENT NUMBER: 90
Nebraska State Treasurer's Office
Kay Orr
State Treasurer
Lincoln NE

DOCUMENT NUMBER: 91
Nebraska Supreme Court
Administrator's Office
Joe C. Steele
State Court Administrator
Lincoln NE

DOCUMENT NUMBER: 92
Nebraska Supreme Court
Administrator's Office
Joe C. Steele
State Court Administrator
Lincoln NE

DOCUMENT NUMBER: 93
Southeast Wyoming Mental Health Center
Laramie County Branch
Raymond Muhr, Th.D.
Director-Psychologist
Cheyenne WY

STATE

DOCUMENT NUMBER: 94
Southeast Wyoming Mental Health Center
Laramie County Branch
Raymond Muhr, Th.D.
Director-Psychologist
Cheyenne WY

DOCUMENT NUMBER: 95
University of Nebraska
College of Architecture
Charles Y. Deknatel
Associate Professor
Lincoln NE

DOCUMENT NUMBER: 96
University of Nebraska
Institute of Agri. & Natural Resources
Warren Barrash
Research Hydrogeologist
Lincoln NE

DOCUMENT NUMBER: 97
University of Nebraska
Institute of Agri. & Natural Resources
Warren Barrash
Research Hydrogeologist
Lincoln NE

DOCUMENT NUMBER: 98
University of Wyoming
Institute for Policy Research
Dr. Shelby D. Gerking
Laramie WY

DOCUMENT NUMBER: 99
University of Wyoming
Department of Zoology and Physiology
Harold L. Bergman
Associate Professor
Thomas W. LaPoint
Assistant Professor
Laramie WY

DOCUMENT NUMBER: 100
University of Wyoming
Recreation and Park Administration
Tom Buchanan
Lawrence R. Allen
Laramie WY

STATE

DOCUMENT NUMBER: 101
University of Wyoming
Institute for Policy Research
Dr. Shelby D. Gerking
Director
Department of Agricultural Economics
Carl Olson
Department of Geography
Larry Ostresh
Laramie WY

DOCUMENT NUMBER: 102
University of Wyoming
Wyoming Water Research Center
Robert Brocksen
Tom Wesche
Greg Kerr
Walt Eifert
Laramie WY

DOCUMENT NUMBER: 103
Wyoming Adjutant General
National Guard Headquarters
Daniel E. Nordin
Cheyenne WY

DOCUMENT NUMBER: 104
Wyoming Aeronautics Commission
Cass Krauser
Director
Cheyenne WY

DOCUMENT NUMBER: 105
Wyoming Archives, Museums & Hist. Dept.
Robert D. Bush
Director
Cheyenne WY

DOCUMENT NUMBER: 106
Wyoming Archives, Museums & Hist. Dept.
Robert Bush
Director
Cheyenne WY

DOCUMENT NUMBER: 107
Wyoming Archives, Museums & Hist. Dept.
Rick Ewig
Research & Oral History Supervisor
Cheyenne WY

STATE

DOCUMENT NUMBER: 108
Wyoming Archives, Museums & Hist. Dept.
Archives & Records Mgmt. Division
Jim Donahue
Cheyenne WY

DOCUMENT NUMBER: 109
Wyoming Archives, Museums & Hist. Dept.
Museums & Historical Sites Division
Mike Mayfield
Division Head
Cheyenne WY

DOCUMENT NUMBER: 110
Wyoming Attorney General
Lawrence J. Wolfe
Senior Assistant Attorney General
Marion Yoder
Assistant Attorney General
Cheyenne WY

DOCUMENT NUMBER: 111
Wyoming Attorney General
Lawrence J. Wolfe
Senior Assistant Attorney General
John D. Erdmann
Assistant Attorney General
Cheyenne WY

DOCUMENT NUMBER: 112
Wyoming Conservation Commission
Bill Gentle
Conservation State Executive
Cheyenne WY

DOCUMENT NUMBER: 113
Wyoming Dept. of Admin. & Fiscal Control
Research and Statistics Division
Steve Furtney
Cheyenne WY

DOCUMENT NUMBER: 114
Wyoming Dept. of Admin. & Fiscal Control
Research and Statistics Division
Steve Furtney
Cheyenne WY

STATE

DOCUMENT NUMBER: 115
Wyoming Dept. of Agriculture
Div. of Agricultural Planning & Dev.
Collin Fallat
Director
Cheyenne WY

DOCUMENT NUMBER: 116
Wyoming Dept. of Economic Plng. and Dev.
Steve Achter
Cheyenne WY

DOCUMENT NUMBER: 117
Wyoming Dept. of Environmental Quality
Air Quality Division
Cathy Rhodes
Air Quality Associate Engineer
Cheyenne WY

DOCUMENT NUMBER: 118
Wyoming Dept. of Environmental Quality
Land Quality Division
Gary Beach
Cheyenne WY

DOCUMENT NUMBER: 119
Wyoming Dept. of Environmental Quality
Land Quality Division
Dennis Fransway
Principal Environmental Analyst
Cheyenne WY

DOCUMENT NUMBER: 120
Wyoming Dept. of Environmental Quality
Water Quality Division
LeRoy C. Feusner, P.E.
Southeast District Supervisor
Cheyenne WY

DOCUMENT NUMBER: 121
Wyoming Dept. of Environmental Quality
Water Quality Division
LeRoy C. Feusner, P.E.
Southeast District Supervisor
Cheyenne WY

DOCUMENT NUMBER: 122
Wyoming Dept. of Health & Soc. Services
Division of Community Programs
Julie Robinson
Administrator
Cheyenne WY

STATE

DOCUMENT NUMBER: 123
Wyoming Dept. of Health & Soc. Services
Division of Community Programs
Julie Robinson
Administrator
Cheyenne WY

DOCUMENT NUMBER: 124
Wyoming Dept. of Health & Soc. Services
Division of Health and Medical Services
Lawrence J. Cohen, M.D.
Administrator
Cheyenne WY

DOCUMENT NUMBER: 125
Wyoming Dept. of Health & Soc. Services
Laramie County Div. of Public Assistance
Ralph C. McConahy
Manager
Cheyenne WY

DOCUMENT NUMBER: 126
Wyoming Dept. of Health & Soc. Services
Laramie County Div. of Public Assistance
Ralph C. McConahy
Manager
Cheyenne WY

DOCUMENT NUMBER: 127
Wyoming Dept. of Health & Soc. Services
Office of Planning & Administration
Frederick J. Lund
Administrator
Cheyenne WY

DOCUMENT NUMBER: 128
Wyoming Dept. of Labor and Statistics
Michael J. Sullivan
Acting Commissioner
Cheyenne WY

DOCUMENT NUMBER: 129
Wyoming Dept. of Public Lands
Farm Loan Department
Oscar E. Swan
Commissioner
Cheyenne WY

STATE

DOCUMENT NUMBER: 130
Wyoming Dept. of Public Lands
Farm Loan Department
Oscar E. Swan
Commissioner
Cheyenne WY

DOCUMENT NUMBER: 131
Wyoming Employment Security Commission
Dick Sadler
Executive Director
Casper WY

DOCUMENT NUMBER: 132
Wyoming Employment Security Commission
Unemployment Compensation Division
Harold Bolger
Administrator
Casper WY

DOCUMENT NUMBER: 133
Wyoming Game and Fish Department
Bill Morris
Assistant Director - Services
Cheyenne WY

DOCUMENT NUMBER: 134
Wyoming Game and Fish Department
Francis Petra
Assistant Director - Operations
Cheyenne WY

DOCUMENT NUMBER: 135
Wyoming Geological Survey
Gary B. Glass
State Geologist
Laramie WY

DOCUMENT NUMBER: 136
Wyoming Industrial Siting Administration
Richard C. Moore, P.E.
Director
Cheyenne WY

DOCUMENT NUMBER: 137
Wyoming Industrial Siting Administration
Richard C. Moore, P.E.
Director
Cheyenne WY

STATE

DOCUMENT NUMBER: 138
Wyoming Occupational Hlth. & Sfty. Dept.
Donald D. Owsley
Health and Safety Administrator
Cheyenne WY

DOCUMENT NUMBER: 139
Wyoming Office of the Governor
W. D. Nelson
Administrative Aide
Cheyenne WY

DOCUMENT NUMBER: 140
Wyoming Oil & Gas Conservation Comm.
Donald B. Basko
State Oil and Gas Supervisor
Casper WY

DOCUMENT NUMBER: 141
Wyoming Public Defender
Charlotte W. Roney
Fiscal Officer
Cheyenne WY

DOCUMENT NUMBER: 142
Wyoming Public Service Commission
Utilities Dept.
Jon F. Jacquot
Lead Electrical Engineer
Cheyenne WY

DOCUMENT NUMBER: 143
Wyoming Public Service Commission
Utilities Dept.
Jon F. Jacquot
Lead Electrical Engineer
Cheyenne WY

DOCUMENT NUMBER: 144
Wyoming Recreation Commission
Alvin F. Bastron, P.E.
Director
Cheyenne WY

DOCUMENT NUMBER: 145
Wyoming Recreation Commission
Alvin F. Bastron, P.E.
Director
Cheyenne WY

STATE

DOCUMENT NUMBER: 146
Wyoming Recreation Commission
State Historic Preservation Office
Mark Junge
Deputy State Historic Preservation Offr.
Dennis Madden
Compliance Historian
Richard Bryant
Compliance Archeologist
Cheyenne WY

DOCUMENT NUMBER: 147
Wyoming State Engineer's Office
George L. Christopulos
State Engineer
Cheyenne WY

DOCUMENT NUMBER: 148
Wyoming State Highway Dept.
William P. King, P.E.
Environmental Services Engineer
Cheyenne WY

DOCUMENT NUMBER: 149
Wyoming State Highway Dept.
William P. King, P.E.
Environmental Services Engineer
Cheyenne WY

COUNTY

DOCUMENT NUMBER: 150
Banner County
County Board of Commissioners
Klayton D. Johnson
Chairman
Harrisburg NE

DOCUMENT NUMBER: 151
Banner County
County Board of Commissioners
Klayton D. Johnson
Chairman
Harrisburg NE

DOCUMENT NUMBER: 152
Banner County
County Board of Commissioners
Klayton D. Johnson
Chairman
Eldon Lundberg
Commissioner
Harrisburg NE

COUNTY

DOCUMENT NUMBER: 153
Kimball County
County Board of Commissioners
Lyle Shaw
Chairman
Lincoln NE

DOCUMENT NUMBER: 154
Kimball County
County Board of Commissioners
Lyle Shaw
Chairman
Vernon J. Bourlier
Vice Chairman
Val Deane Snyder
Member
Kimball NE

DOCUMENT NUMBER: 155
Kimball County
County Board of Commissioners
Lyle Shaw
Chairman
Kimball NE

DOCUMENT NUMBER: 156
Laramie County
County Board of Commissioners
Shirley Francis
Commissioner
Cheyenne WY

DOCUMENT NUMBER: 157
Laramie County
County Court
Franklin Mockler
County Judge
Cheyenne WY

DOCUMENT NUMBER: 158
Scotts Bluff County
County Board of Commissioners
William C. Peters
Chairperson
Gering NE

DOCUMENT NUMBER: 159
Scotts Bluff County
County Board of Commissioners
William C. Peters
Chairperson
Gering NE

COUNTY

DOCUMENT NUMBER: 160
Cheyenne-Laramie Co. Regional Plan. Off.
Jon L. Arason
Cheyenne WY

DOCUMENT NUMBER: 161
Cheyenne-Laramie Co. Regional Plan. Off.
Jon L. Arason
Cheyenne WY

DOCUMENT NUMBER: 162
Cheyenne-Laramie Co. Regional Plan. Off.
Jon L. Arason
Cheyenne WY

DOCUMENT NUMBER: 163
Goshen County
Clerk's Office
Wendell E. Grapes
County Clerk
Torrington WY

DOCUMENT NUMBER: 164
Laramie Co./Cheyenne Civil Defense Ag.
Office of Emergency Preparedness
David M. Guille
Director
Cheyenne WY

DOCUMENT NUMBER: 165
Laramie County
H.L. "Toby" Miskimins
Fire Warden
Cheyenne WY

DOCUMENT NUMBER: 166
Laramie County
County Court
Judge Robert W. Allen
Cheyenne WY

DOCUMENT NUMBER: 167
Laramie County
County Engineer's Office
R.H. Whitney
County Engineer
Cheyenne WY

COUNTY

DOCUMENT NUMBER: 168
Laramie County
District Court
Gerrie E. Bishop
Clerk
Cheyenne WY

DOCUMENT NUMBER: 169
Laramie County
Fire District 2
Chief Gary Scott
Cheyenne WY

DOCUMENT NUMBER: 170
Laramie County
School District Number One
Dean Conine, Ed.D.
Asst. Superintendent-Business Services
Cheyenne WY

DOCUMENT NUMBER: 171
Laramie County
School District Number One
Dean Conine, Ed.D.
Asst. Superintendent-Business Services
Cheyenne WY

DOCUMENT NUMBER: 172
Laramie County Community College
Arthur H. Ellis
Assoc. Dean for Educational Development
Oliver Sundby
Wyoming Community College Commission
Cheyenne WY

DOCUMENT NUMBER: 173
Laramie County Extension Office
Philip A. Rosenlund
University Extension Agent
Cheyenne WY

DOCUMENT NUMBER: 174
Laramie County Extension Office
Philip A. Rosenlund
University Extension Agent
Cheyenne WY

COUNTY

DOCUMENT NUMBER: 175
Laramie County Health Planning Committee
Jane L. Dorn
Planning Coordinator
Cheyenne WY

DOCUMENT NUMBER: 176
Laramie County Library System
County Librarian
Cheyenne WY

DOCUMENT NUMBER: 177
Laramie County-Cheyenne City Health Unit
Maija D. Farenhorst, R.N., MPH
Nursing Director
Cheyenne WY

DOCUMENT NUMBER: 178
Laramie County-Cheyenne City Health Unit
Maija D. Farenhorst, R.N., MPH
Nursing Director
Cheyenne WY

DOCUMENT NUMBER: 179
Laramie County
County Clerk and Register of Deeds
Janet C. Whitehead
Laramie County Clerk
Robert W. Cook
Fiscal Officer
Cheyenne WY

DOCUMENT NUMBER: 180
Platte County
School District Number One
Edward W. Hunter
Superintendent of Schools
Wheatland WY

DOCUMENT NUMBER: 181
Scotts Bluff Co./Twin City Civil Defense
Sherry Blaha
Civil Defense Coordinator
Gering NE

CITY AND MUNICIPAL

DOCUMENT NUMBER: 182
City of Cheyenne
Mayor's Office
Mayor Don Erickson
Cheyenne WY

DOCUMENT NUMBER: 183
City of Cheyenne
Mayor's Office
Mayor Don Erickson
Cheyenne WY

DOCUMENT NUMBER: 184
City of Gering
Mayor's Office
Mayor John McLellan
Gering NE

DOCUMENT NUMBER: 185
City of Kimball
Mayor's Office
Mayor Edith Haines
Kimball NE

DOCUMENT NUMBER: 186
City of Kimball
Mayor's Office
Mayor Edith Haines
Kimball NE

DOCUMENT NUMBER: 187
Town of Pine Bluffs
Mayor's Office
Mayor Timothy Conner
Pine Bluffs WY

DOCUMENT NUMBER: 188
City of Cheyenne
City Council
Ron N. Rogers
City Council Ward I
Cheyenne WY

DOCUMENT NUMBER: 189
Village of Dix
Board of Trustees
Jerry D. Lane
Chairman
Dix NE

CITY AND MUNICIPAL

DOCUMENT NUMBER: 190
Cheyenne Airport
John Wood
Airport Manager
Cheyenne WY

DOCUMENT NUMBER: 191
City of Bridgeport
Arda Rae Biss
City Clerk-Treasurer
Bridgeport NE

DOCUMENT NUMBER: 192
City of Cheyenne
John Sandahl
Capital Facilities Coordinator
Cheyenne WY

DOCUMENT NUMBER: 193
City of Cheyenne
John Sandahl
Capital Facilities Coordinator
Cheyenne WY

DOCUMENT NUMBER: 194
City of Cheyenne
Administrative Services
Ross Johnson
Cheyenne WY

DOCUMENT NUMBER: 195
City of Cheyenne
Board of Public Utilities
Herman Noe
Director
Cheyenne WY

DOCUMENT NUMBER: 196
City of Cheyenne
Board of Public Utilities
Herman Noe
Director
Cheyenne WY

DOCUMENT NUMBER: 197
City of Cheyenne
City Engineer's Office
Gary L. Grunkemeyer
Director of Public Works/City Engineer
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 198
City of Cheyenne
City Engineer's Office
Roger Peterson, P.E.
Assistant City Engineeer
Cheyenne WY

DOCUMENT NUMBER: 199
City of Cheyenne
City Engineer's Office
Roger Peterson, P.E.
Assistant City Engineer
Cheyenne WY

DOCUMENT NUMBER: 200
City of Cheyenne
Fire Department
Chief Charles Garey
Cheyenne WY

DOCUMENT NUMBER: 201
City of Cheyenne
Mayor's Office
Mick Snapp
Executive Assistant
Cheyenne WY

DOCUMENT NUMBER: 202
City of Cheyenne
Mayor's Office
Mick Snapp
Executive Assistant
Cheyenne WY

DOCUMENT NUMBER: 203
City of Cheyenne
Parks and Recreation Dept.
Dave Romero
Director
Cheyenne WY

DOCUMENT NUMBER: 204
City of Cheyenne
Parks and Recreation Dept.
Dave Romero
Director
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 205
City of Cheyenne
Police Department
Capt. D.I. Patterson
Cheyenne WY

DOCUMENT NUMBER: 206
City of Cheyenne
Police Department
Capt. Don Pierson
Cheyenne WY

DOCUMENT NUMBER: 207
City of Cheyenne
Police Department
Chief B.R. Rookstool
Cheyenne WY

DOCUMENT NUMBER: 208
City of Cheyenne
Public Works Dept.
Jerry Morse
Director of Street & Alley
Cheyenne WY

DOCUMENT NUMBER: 209
City of Cheyenne
Public Works Dept.
Jerry Morse
Director of Street & Alley
Cheyenne WY

DOCUMENT NUMBER: 210
City of Cheyenne
Sanitation Department
Felix Pino
Superintendent
Cheyenne WY

DOCUMENT NUMBER: 211
City of Cheyenne
Traffic Engineering Department
Bill Cloyd
City Traffic Engineer
Cheyenne WY

DOCUMENT NUMBER: 212
City of Cheyenne
Weed and Pest Control
Bob Lee
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 213
City of Cheyenne
Youth Alternatives
Ronn Jeffrey
Director
Cheyenne WY

DOCUMENT NUMBER: 214
City of Cheyenne Mayor's Impact Team
Virgil D. Slough
Chairman
Cheyenne WY

DOCUMENT NUMBER: 215
City of Cheyenne Mayor's Impact Team
Coping Mechanisms Subcommittee
Ellen Crowley
Chairman
Cheyenne WY

DOCUMENT NUMBER: 216
City of Cheyenne Mayor's Impact Team
Coping Mechanisms Subcommittee
Ellen Crowley
Chairman
Cheyenne WY

DOCUMENT NUMBER: 217
City of Cheyenne Mayor's Impact Team
Economic Subcommittee/Chamber of Commerce
John B. Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 218
City of Cheyenne Mayor's Impact Team
Economic Subcommittee/Chamber of Commerce
John B. Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 219
City of Cheyenne Mayor's Impact Team
Health Facilities & Services Subcom.
Jane L. Dorn
Chairman
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 220
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Barbara Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 221
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Barbara Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 222
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Barbara Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 223
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Barbara Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 224
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Barbara Rogers
Chairman
Cheyenne WY

DOCUMENT NUMBER: 225
City of Cheyenne Mayor's Impact Team
Heritage, Values & Well-Being Subcom.
Robin Volk
Cheyenne WY

DOCUMENT NUMBER: 226
City of Cheyenne Mayor's Impact Team
Housing Subcommittee
Thomas Kilty
Chairman
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 227
City of Cheyenne Mayor's Impact Team
Housing Subcommittee
Thomas Kilty
Chairman
Will Sanchez
Cheyenne WY

DOCUMENT NUMBER: 228
City of Cheyenne Mayor's Impact Team
Housing Subcommittee
Thomas Kilty
Chairman
Will Sanchez
Cheyenne WY

DOCUMENT NUMBER: 229
City of Cheyenne Mayor's Impact Team
Housing Subcommittee
Will Sanchez
Cheyenne WY

DOCUMENT NUMBER: 230
City of Cheyenne Mayor's Impact Team
Intergovernmental Subcommittee
Norman V. Cable
Chairman
Cheyenne WY

DOCUMENT NUMBER: 231
City of Cheyenne Mayor's Impact Team
Land Use Subcommittee
Thomas H. Cole
Chairman
Cheyenne WY

DOCUMENT NUMBER: 232
City of Cheyenne Mayor's Impact Team
Land Use Subcommittee
Adora L. Palma
Cheyenne WY

DOCUMENT NUMBER: 233
City of Cheyenne Mayor's Impact Team
Land Use Subcommittee
Maury Plambeck
Cheyenne WY

DOCUMENT NUMBER: 234
City of Cheyenne Mayor's Impact Team
Land Use Subcommittee
Maury Plambeck
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 235
City of Cheyenne Mayor's Impact Team
Public Works Subcommittee
John Sandahl
Cheyenne WY

DOCUMENT NUMBER: 236
City of Cheyenne Mayor's Impact Team
Public Works Subcommittee
Leonard Sullivan
Chairman
Cheyenne WY

DOCUMENT NUMBER: 237
City of Cheyenne Mayor's Impact Team
Recreation Subcommittee
John Barnett
Cheyenne WY

DOCUMENT NUMBER: 238
City of Cheyenne Mayor's Impact Team
Recreation Subcommittee
John Barnett
Cheyenne WY

DOCUMENT NUMBER: 239
City of Cheyenne Mayor's Impact Team
Recreation Subcommittee
Ralph T. Robinson
Chairman
Cheyenne WY

DOCUMENT NUMBER: 240
City of Cheyenne Mayor's Impact Team
Transportation Subcommittee
Michael N. Gostovich
Chairman
Cheyenne WY

DOCUMENT NUMBER: 241
City of Cheyenne Mayor's Impact Team
Transportation Subcommittee
Michael N. Gostovich
Chairman
Cheyenne WY

DOCUMENT NUMBER: 242
City of Cheyenne Mayor's Impact Team
Transportation Subcommittee
Michael N. Gostovich
Chairman
Cheyenne WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 243
City of Kimball
Municipal Utilities
Robert E. Arraj
City Administrator
Kimball NE

DOCUMENT NUMBER: 244
City of Laramie
George "Flip" McConnaughey
City Manager
Laramie WY

DOCUMENT NUMBER: 245
City of Scottsbluff
Frank U. Koehler
City Manager
Scottsbluff NE

DOCUMENT NUMBER: 246
City of Scottsbluff
Frank U. Koehler
City Manager
Scottsbluff NE

DOCUMENT NUMBER: 247
Frontier Conservation District
Ed Francis
Secretary
Cheyenne WY

DOCUMENT NUMBER: 248
South Cheyenne Water & Sewer District
Floydine J. Gay
Secretary-Treasurer
Cheyenne WY

DOCUMENT NUMBER: 249
Town of LaGrange
Clerk's Office
Thelma R. Marshall
Clerk
LaGrange WY

DOCUMENT NUMBER: 250
Town of Wheatland
Clerk's Office
James Dunham
Clerk
Wheatland WY

CITY AND MUNICIPAL

DOCUMENT NUMBER: 251
Village of Morrill
Clerk's Office
Delores Eagelston
Clerk
Morrill NE

ORGANIZATIONS

DOCUMENT NUMBER: 252
American Indians Against Desecration
Jan Hammil
Director
Indianapolis IN

DOCUMENT NUMBER: 253
Broken Plow Law Office
Andrew B. Reid, Esq.
Chadron NE

DOCUMENT NUMBER: 254
Casper MX Deployment Concerns
Casper Geologists and Hydrologists
Carol M. Schure
Casper WY

DOCUMENT NUMBER: 255
Casper MX Deployment Concerns
Casper Geologists and Hydrologists
Carol M. Schure
Casper WY

DOCUMENT NUMBER: 256
Center for Law in the Public Interest
Nicholas C. Yost
Washington D.C.

DOCUMENT NUMBER: 257
Colorado Council of Churches
Rev. Stephen Sidorak, Jr.
Executive Director
Denver CO

DOCUMENT NUMBER: 258
Colorado Council of Churches
Rev. Stephen Sidorak, Jr.
Executive Director
Denver CO

ORGANIZATIONS

DOCUMENT NUMBER: 259
Colorado Council of Churches
Rev. Stephen Sidorak, Jr.
Executive Director
Denver CO

DOCUMENT NUMBER: 260
Community Action of Laramie County
Timothy P. Daly
Outreach Director
Cheyenne WY

DOCUMENT NUMBER: 261
Community Action of Laramie County
Timothy P. Daly
Outreach Director
Cheyenne WY

DOCUMENT NUMBER: 262
Domestic Violence Task Force
Betsi Barrash
Scottsbluff NE

DOCUMENT NUMBER: 263
Laramie County Citizens for Mental Health, Inc.
Community Center on Domestic Violence
Jeanie Sedgely
Executive Director
Cheyenne WY

DOCUMENT NUMBER: 264
MX Information Center
DEIS Review Committee
Stephen Erickson
Chair
Salt Lake City UT

DOCUMENT NUMBER: 265
MX Information Center
Mary Denslow-Smith
Co-Chair
Patricia Sexton
Co-Chair
Salt Lake City UT

DOCUMENT NUMBER: 266
Mountain West Environmental Services
Robert D. Dorn
President
Cheyenne WY

ORGANIZATIONS

DOCUMENT NUMBER: 267
Nature Conservancy
Big Sky Field Office
Bob Kiesling
Field Director
Helena MT

DOCUMENT NUMBER: 268
Nature Conservancy
Wyoming Natural Heritage Program
Robert W. Lichvar
Plant Taxonomist/Program Coordinator
Cheyenne WY

DOCUMENT NUMBER: 269
Nebraska Nuclear Weapons Freeze Campaign
Brian D. Coyne
State Coordinator
Lincoln NE

DOCUMENT NUMBER: 270
Nebraskans Opposed to the MX (NO MX)
Susan I. Buckles, Esq.
Attorney
Scottsbluff NE

DOCUMENT NUMBER: 271
Nebraskans Opposed to the MX (NO MX)
Susan I. Buckles, Esq.
Attorney
Scottsbluff NE

DOCUMENT NUMBER: 272
Nebraskans Opposed to the MX (NO MX)
Jeff D. Tracy
Coordinator
Scottsbluff NE

DOCUMENT NUMBER: 273
Nebraskans Opposed to the MX (NO MX)
Jeff D. Tracy
Coordinator
Scottsbluff NE

DOCUMENT NUMBER: 274
Nebraskans Opposed to the MX (NO MX)
Jeff D. Tracy
Coordinator
Scottsbluff NE

ORGANIZATIONS

DOCUMENT NUMBER: 275
Nebraskans Opposed to the MX (NO MX)
Jeff D. Tracy
Coordinator
Scottsbluff NE

DOCUMENT NUMBER: 276
Nebraskans Opposed to the MX (NO MX)
Jeff D. Tracy
Coordinator
Nebraskans for Peace
Betty Olson
Coordinator
Scottsbluff NE

DOCUMENT NUMBER: 277
Nebraskans for Peace
Betty Olson
Coordinator
Lincoln NE

DOCUMENT NUMBER: 278
Nebraskans for Peace
Betty Olson
Coordinator
Lincoln NE

DOCUMENT NUMBER: 279
Nuclear Club
University of Wyoming
Julian L. Hadley
Sec./Treasurer
Laramie WY

DOCUMENT NUMBER: 280
Oliver Reservoir Project
W.J. Batterton
Kimball NE

DOCUMENT NUMBER: 281
Panhandle Military Affairs Committee
Mike Hartzler
Kimball NE

DOCUMENT NUMBER: 282
Panhandle Military Affairs Committee
J. Wayne Robbins
Kimball NE

ORGANIZATIONS

DOCUMENT NUMBER: 283
Physicians for Social Responsibility
Richard Gardiner
Midwest Regional Director
Chicago IL

DOCUMENT NUMBER: 284
Physicians for Social Responsibility
Richard Gardiner
Midwest Regional Director
Chicago IL

DOCUMENT NUMBER: 285
Physicians for Social Responsibility
Dr. Ira Helfand
Northhampton MA

DOCUMENT NUMBER: 286
Physicians for Social Responsibility
Dr. Ira Helfand
Northhampton MA

DOCUMENT NUMBER: 287
Poudre Nuclear Freeze Campaign
Susan Hierta
Fort Collins CO

DOCUMENT NUMBER: 288
Powder River Basin Resource Council
Grant D. Parker
Cheyenne WY

DOCUMENT NUMBER: 289
Presbyterian Churches Committee
Nebraska Panhandle Region
Rev. Howard B. Osborne
Chairman
Bayard NE

DOCUMENT NUMBER: 290
SANE-Committee for a Sane Nuclear Policy
Daniel Horner
Washington D.C.

DOCUMENT NUMBER: 291
STRIDE Learning Center
Ann R. Huey
Administrator
Cheyenne WY

ORGANIZATIONS

DOCUMENT NUMBER: 292
Sierra Club
Northern Great Plains Region
Bruce Hamilton
Regional Representative
Lander WY

DOCUMENT NUMBER: 293
Sierra Club
Wyoming Chapter
Michael Massie
Vice Chairman
Lander WY

DOCUMENT NUMBER: 294
Snake River Alliance
Kerry Cooke
Boise ID

DOCUMENT NUMBER: 295
St. Marks Church
Father Eugene Todd
Rector
Cheyenne WY

DOCUMENT NUMBER: 296
Tri-State MX Coalition
Eileen M. Lappe
Cheyenne WY

DOCUMENT NUMBER: 297
Tri-State MX Coalition
Sister Francis Russell
Coordinator
Cheyenne WY

DOCUMENT NUMBER: 298
Western Solidarity
Evelyn Lifsey
Coordinator
Denver CO

DOCUMENT NUMBER: 299
Western Solidarity
Evelyn Lifsey
Coordinator
Denver CO

ORGANIZATIONS

DOCUMENT NUMBER: 300
Western Solidarity
Evelyn Lifsey
Coordinator
Denver CO

DOCUMENT NUMBER: 301
Western Solidarity
Evelyn Lifsey
Coordinator
Denver CO

DOCUMENT NUMBER: 302
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 303
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 304
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 305
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 306
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 307
Western Solidarity
Marla G. Painter
Carson City NV

DOCUMENT NUMBER: 308
Western Solidarity
Marla G. Painter
Carson City NV

ORGANIZATIONS

DOCUMENT NUMBER: 309
Western Solidarity
Tim Strand
Cheyenne WY

DOCUMENT NUMBER: 310
Western Solidarity
Tim Strand
Cheyenne WY

DOCUMENT NUMBER: 311
Western Solidarity
Tim Strand
Andrew B. Reid, Esq.
Denver CO

DOCUMENT NUMBER: 312
Western Solidarity
Mary Wilham
Helena MT
Rob Sand
Charlo MT

DOCUMENT NUMBER: 313
Wyoming Children as Teachers of Peace
Becky M. Ruffing
Representative
Laramie WY

DOCUMENT NUMBER: 314
Wyoming Native Plant Society
E. F. Evert
President
Cheyenne WY

DOCUMENT NUMBER: 315
Wyoming Nuclear Weapons Freeze Coalition
Sarah Gorin Jones
Laramie WY

DOCUMENT NUMBER: 316
Wyoming Nuclear Weapons Freeze Coalition
Rev. Dr. Sally Palmer
Laramie WY

DOCUMENT NUMBER: 317
Wyoming Nuclear Weapons Freeze Coalition
Rev. Dr. Sally Palmer
Laramie WY

ORGANIZATIONS

DOCUMENT NUMBER: 318
Wyoming Nuclear Weapons Freeze Coalition
Laura Stafford
Chairman
Sarah Gorin Jones
Laramie WY

DOCUMENT NUMBER: 319
Wyoming Outdoor Council
Josephine Porter
President
Cheyenne WY

DOCUMENT NUMBER: 320
Wyoming Wildlife Federation
Natural Resources Committee
Tom Dougherty
Chairman
Cheyenne WY

DOCUMENT NUMBER: 321
Wyomings Against MX
Linda Kirkbride
Meriden WY

DOCUMENT NUMBER: 322
Wyomings Against MX - Goshen County
Jim R. Fuller
Torrington WY

DOCUMENT NUMBER: 323
Wyomings Against MX - Goshen County
Jim R. Fuller
Torrington WY

INDIVIDUALS

DOCUMENT NUMBER: 324
Anonymous

DOCUMENT NUMBER: 325
Anonymous

DOCUMENT NUMBER: 326
Anonymous

INDIVIDUALS

DOCUMENT NUMBER: 327
Anonymous

DOCUMENT NUMBER: 328
Theran Anderson
Albin WY

DOCUMENT NUMBER: 329
Irving J. Arnquist
Kimball NE

DOCUMENT NUMBER: 330
Rev. Norman E. Austin
Kimball NE

DOCUMENT NUMBER: 331
Dennis G. Baack
Dix NE

DOCUMENT NUMBER: 332
Susan G. Baack
Dix NE

DOCUMENT NUMBER: 333
Rojane Barrett
Harrisburg NE

DOCUMENT NUMBER: 334
Bill Batterton
Kimball NE

DOCUMENT NUMBER: 335
John W. Blevins
Guernsey WY

DOCUMENT NUMBER: 336
Tom Bougsty, Ph.D.
Cheyenne WY

DOCUMENT NUMBER: 337
Sharon Breitweiser
Laramie WY

DOCUMENT NUMBER: 338
Florence Burden
Torrington WY

INDIVIDUALS

DOCUMENT NUMBER: 339
Mary Ann Buscaj
Wheatland WY

DOCUMENT NUMBER: 340
Mary Ann Buscaj
Wheatland WY

DOCUMENT NUMBER: 341
Carie Campbell
Torrington WY

DOCUMENT NUMBER: 342
Dr. Richard M. Campbell
Torrington WY

DOCUMENT NUMBER: 343
Colleen Cholensky
North Branch MN

DOCUMENT NUMBER: 344
Andrea L. Cook
Cheyenne WY

DOCUMENT NUMBER: 345
Erwin F. Evert
Park Ridge IL

DOCUMENT NUMBER: 346
Maija D. Farenhorst, R.N., MPH
Cheyenne WY

DOCUMENT NUMBER: 347
John B. Ferguson
Kimball NE

DOCUMENT NUMBER: 348
Ronald L. Fischer
Green River WY

DOCUMENT NUMBER: 349
Kathy Flaccus
Casper WY

DOCUMENT NUMBER: 350
Christine L. Francis
Cheyenne WY

INDIVIDUALS

DOCUMENT NUMBER: 351
A.C. Genz
Lander WY

DOCUMENT NUMBER: 352
Norman Greene
Bushnell NE

DOCUMENT NUMBER: 353
Julian L. Hadley
Laramie WY

DOCUMENT NUMBER: 354
Keith Hadley
Laramie WY

DOCUMENT NUMBER: 355
Gwynne Hallock
Fort Collins CO

DOCUMENT NUMBER: 356
David Hansen
Meriden WY

DOCUMENT NUMBER: 357
Stanley T. Holmes III
Salt Lake City UT

DOCUMENT NUMBER: 358
Elizabeth Marsh Jensen
LaGrange WY

DOCUMENT NUMBER: 359
Elizabeth Marsh Jensen
LaGrange WY

DOCUMENT NUMBER: 360
Pastor Wayne Josephson
Lodgepole NE

DOCUMENT NUMBER: 361
Kathie Joyner
Professional Archeologist
David J. McGuire
Professional Archeologist
Laramie WY

DOCUMENT NUMBER: 362
Tim Kees
Alliance NE

INDIVIDUALS

DOCUMENT NUMBER: 363
Norman T. Kinney
Torrington WY

DOCUMENT NUMBER: 364
Monica Kirk
Attorney
Mitchell NE

DOCUMENT NUMBER: 365
Alan Kirkbride
Meriden WY

DOCUMENT NUMBER: 366
Linda L. Kirkbride
Meriden WY

DOCUMENT NUMBER: 367
Linda L. Kirkbride
Meriden WY

DOCUMENT NUMBER: 368
Mae Kirkbride
Cheyenne WY

DOCUMENT NUMBER: 369
Rodney Kirkbride
Cheyenne WY

DOCUMENT NUMBER: 370
Mark A. Koons
Wheatland WY

DOCUMENT NUMBER: 371
Robert Lawrence
Professor of Political Science
Fort Collins CO

DOCUMENT NUMBER: 372
Robert Lawrence
Professor of Political Science
Fort Collins CO

DOCUMENT NUMBER: 373
Louis Leichtweis
Cheyenne WY

INDIVIDUALS

DOCUMENT NUMBER: 374
Marian Lenzen
Sidney NE

DOCUMENT NUMBER: 375
Marian Lenzen
Sidney NE

DOCUMENT NUMBER: 376
Martha Lukassen
Kimball NE

DOCUMENT NUMBER: 377
Kenneth Macy
Pine Bluffs WY

DOCUMENT NUMBER: 378
Robert Maffeo
Meriden WY

DOCUMENT NUMBER: 379
Joseph P. Mancuso
Laramie WY

DOCUMENT NUMBER: 380
Michael Mancuso
Fort Collins CO

DOCUMENT NUMBER: 381
Mary Lou Marcum
Cheyenne WY

DOCUMENT NUMBER: 382
Prudy S. Marshall, Ph.D.
Psychologist
Cheyenne WY

DOCUMENT NUMBER: 383
Dr. Douglas McConnell
Pine Bluffs WY

DOCUMENT NUMBER: 384
David R. Meyer
Environmental Scientist
Fort Collins CO

DOCUMENT NUMBER: 385
Donna V. Olsen
Harrisburg NE

INDIVIDUALS

DOCUMENT NUMBER: 386
William Olsen
Harrisburg NE

DOCUMENT NUMBER: 387
Brian D. Olson
Cheyenne WY

DOCUMENT NUMBER: 388
Judith K. Olson, Ph.D.
Laramie WY

DOCUMENT NUMBER: 389
Margaret Pettis
Salt Lake City UT

DOCUMENT NUMBER: 390
Verle Punke
Torrington WY

DOCUMENT NUMBER: 391
Victor Rivas
Lincoln NE

DOCUMENT NUMBER: 392
Kevin L. Ruser
Scottsbluff NE

DOCUMENT NUMBER: 393
John Sandahl
Cheyenne WY

DOCUMENT NUMBER: 394
Thomas H. Slone
Boulder CO

DOCUMENT NUMBER: 395
Sylvia I. Soule
Harrisburg NE

DOCUMENT NUMBER: 396
Mary G. Spurgeon
Scottsbluff NE

DOCUMENT NUMBER: 397
Joseph Stern, Esq.
Fort Collins CO

INDIVIDUALS

DOCUMENT NUMBER: 398
Joseph Stern, Esq.
Fort Collins CO

DOCUMENT NUMBER: 399
Jeri L. Stewart
Laramie WY

DOCUMENT NUMBER: 400
Joan A. Synder
Kimball NE

DOCUMENT NUMBER: 401
Santana Tamarak
Scottsbluff NE

DOCUMENT NUMBER: 402
Don Tilley
Lincoln NE

DOCUMENT NUMBER: 403
Mark Trout
Lyman NE

DOCUMENT NUMBER: 404
Edward E. Warsaw
Cheyenne WY

DOCUMENT NUMBER: 405
Sylvia L. Warsaw
Cheyenne WY

6.2 Documents Received

This section includes all documents received during the public comment period. The documents are presented four sheets to a page in numerical order corresponding to the list of respondents shown in Section 6.1. Document numbers which are public hearing testimony reference the reader to the page number where the testimony can be found. All public hearing transcripts are presented at the end of this section in the order in which the hearings were held. Every effort has been made to reproduce all documents in a clear and legible form. However, in several cases, the original documents were handwritten or typed in light ink and therefore did not reproduce clearly. In several instances, the same comments were received on the DEIS and the Draft Jurisdictional EPTR. All these duplicate documents are included to provide a complete record of documents received.

FEDERAL OFFICIALS AND AGENCIES

United States Senate

WASHINGTON, D.C. 20510

1

November 10, 1983

The Honorable Verne Orr
Secretary of the Air Force
Department of the Air Force
Washington, D. C. 20330

Dear Secretary Orr:

Last month, the Air Force released the draft Environmental Impact Statement (EIS) for the deployment of 100 MX missiles in existing MINUTEMAN missile silos. Last week, seven public hearings were held in the Nebraska and Wyoming deployment areas to provide the public with a summary of this draft EIS and to respond to their questions.

One portion of the draft EIS concerns the planned increase in the Quantity Distance requirements which would be required for the MX as opposed to the currently-deployed MINUTEMAN missiles. I understand that the exact amount of the increase will not be determined until a distance figure is validated next spring following further tests. However, for planning purposes, the Air Force intends to acquire restrictive easements of 1,750 feet as opposed to the current 1,100-foot distance from the missile silos. This action is intended to preclude present and future encroachment of any inhabited buildings for safety purposes to protect people in the event of an accidental explosion of the missile's solid propellant.

Five Nebraska and four Wyoming families will be affected since their existing homes and ranch/farm support buildings lie within this expanded safety zone. The Air Force has already contacted these families and discussed with them several options from which they can choose in dealing with this problem following validation of the exact distance of additional easement required next spring. The options presented to these families include the sale of the residence and associated improvements to the Air Force for "fair market value" subject to negotiation with the owners; sale of only the house to the Air Force at "fair market value" with the proceeds to be used to build a new residence outside the safety zone or have the existing residence moved outside that zone; and an exemption from the safety zone requirements for those families who desire to remain in place despite the increased safety zone.

vember 10, 1983
age two,

I have been advised by your staff that these three options are not the only ones which can be considered and that the Air Force is willing to entertain any reasonable suggestion for resolving this problem subject to negotiation.

192 I am certain you understand how traumatic this matter is for the families involved. They believe, as do I, that the Air Force has a responsibility to fully compensate them for the costs associated with the choices they face. In my view, "fair market value" should mean full "replacement" value in those cases and that losses in property value which would result from these increased safety zones must be fully compensated as well. Additionally, I would like to know the Air Force's plans with respect to work buildings within the expanded safety zone which are not "residences" but which may be inhabited for extensive periods of time daily.

193 The Air Force is now embarking upon this extensive project which has now been approved by the Congress for fiscal year 1984. Given the approximately $10 billion price tag of the MX deployment, I believe that the Air Force should spare no effort to come to equitable settlements with these affected families taking all of their concerns into consideration. I would appreciate greatly your responses to the questions which I have raised and your assurance that the Air Force will give this matter the importance which it deserves.

I look forward to your response and to working with you on this matter. With best wishes.

Sincerely,

J. James Exon
United States Senator

Congress of the United States
House of Representatives
Washington, D.C. 20515

2

November 28, 1983

The Honorable Caspar W. Weinberger
Secretary of Defense
The Pentagon
Washington, D.C. 20301

Dear Secretary Weinberger:

In early October, the Department of the Air Force released the Draft environmental impact statement (DEIS) on deploying the Peacekeeper missile in existing Minuteman and Nebraska [illegible] missile silos. As you know, there is considerable concern in the [illegible] regarding the environmental impacts and the potential health risks that may result from deployment in neighboring states.

22 We believe that citizens should have an opportunity to present their views and have their questions answered [illegible] we support the decision of the Air Force to hold public hearings on the DEIS in the near future in those areas in Colorado most likely to be affected by the deployment. Our staffs are available to assist in the scheduling of these meetings.

William L. Armstrong
United States Senator

Richard D. Lamm
Governor
State of Colorado

Hank Brown
Member of Congress

Gary W. Hart
United States Senator

Patricia Schroeder
Member of Congress

Timothy E. Wirth
Member of Congress

Ray Kogovsek

Ken Kramer

VIRGINIA SMITH

3

Congress of the United States
House of Representatives
Washington, D.C. 20515

October 31, 1983

Honorable Verne Orr
Secretary of the Air Force
The Pentagon
Washington, D.C. 20330

Dear Mr. Secretary:

This is regarding the impact of Peacekeeper missile deployment on my state of Nebraska.

The Draft Environmental Impact Statement on Peacekeeper deployment indicates that the Air Force anticipates the laying of buried cables to link the 400th and 319th Strategic Missile Squadrons. Ten alternative routes are under consideration, each a mile wide, in which a specific 35-foot wide route would be chosen in five of the alternatives. The Draft EIS also states that a temporary easement width of 35 feet will be needed for trenching and cable placement and a permanent easement of 16.5 feet will be needed.

Because the total buried length is estimated to be between 60 to 130 miles, I am concerned about the adverse impact placement of this cable will have on the deployment area.

I am interested in knowing several things about the placement of this cable. What activities will be allowed on the land
182 for which you will seek a permanent easement? When will the Air Force know with certainty the location of the cables? Do any of the ten alternative routes have existing dwellings
137 within their boundaries? What would be the impact on dwellings located within a route chosen for installation?

Thank you for considering these issues of importance to my constituents and me.

With best wishes, I am

Sincerely,

VIRGINIA SMITH
Member of Congress

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330

OFFICE OF THE SECRETARY

Honorable Virginia Smith
House of Representatives
Washington, D.C. 20515

Dear Mrs. Smith:

This is in reply to your October 31, 1983, letter concerning placement of buried cables linking the 400th and 319th Strategic Missile Squadrons for the Peacekeeper missile system. We appreciate the interest you and your constituents have in this matter.

As discussed in the draft Environmental Impact Statement (EIS), there are ten possible cable routes, from which five will be selected. The routes preferred by the Air Force would require only about four miles of buried cable in Nebraska. Since the cables would be placed within existing road rights-of-way, there should be no impact on agricultural operations.

If alternative cable routes identified in the draft EIS are selected, up to about 36 miles of cable could be layed in Nebraska. A portion of these cable routes would follow existing road rights-of-way and up to about 60 acres of permanent easements could be required over ranch and farm land. The 35 foot-wide temporary construction easements would be reduced to a 16.5 foot-wide permanent easement after the cable is installed. Specific cable routes will be selected to minimize adverse impacts. In those cases where it is not possible to place cables within existing road rights-of-way, routes may be adjusted to follow the boundary or fence line of a field. Landowners will be compensated for damages from cable laying operations.

As with the many miles of existing cable for the Minuteman missile system in Nebraska and other states, once a cable is in place, landowners will have full access to the cable easement areas for normal ranching and farming operations. These easement areas may continue to be used by the landowners as long as there is no interference with the cable system which will be buried at a depth of about three feet. No existing dwellings would be affected by any of the possible routes.

Initial engineering will begin in early 1984 and final cable locations will be selected by early 1985. Present schedules call for cable installation to begin in mid-1987.

We trust that this information has been helpful. As always, the Air Force is available to provide any additional information required. Specific comments or questions on the draft EIS should be sent by November 28, 1983, to AFRCE-BMS, Norton AFB, CA 92409. Responses will be addressed in the final EIS to be published by January 31, 1984.

Sincerely,

James P. McCarthy

JAMES P. McCARTHY
Major General, USAF
Director, Legislative
Liaison

4

Federal Emergency Management Agency
Region VIII Denver Federal Center, Building 710 Denver, CO 80225

November 14, 1983

Major Peter Walsh
Director, Environmental Planning Division (DEV)
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

Our agency recently received and subsequently reviewed the Peacekeeper Draft Environmental Impact Statement for Warren Air Force Base, Wyoming. We would encourage the Department of
131 Air Force to incorporate the development of blast and fallout shelter space in any new building which might be built in the missile complex or at F.E. Warren Air Force Base. Our staff is available to give you advice on how to incorporate shelter space in new buildings.

The draft statement did not mention any specific evacuation
135 plans you might have for the missle silo areas in case of an accident. Such as, how many people need to be evacuated, where do they go, which routes are they to take, how are they warned, etc.

If you have any questions, please feel free to contact Gerald Martin (303) 234-2561 of our agency.

Sincerely,

Marion D. Cook
Regional Director

5

United States Department of Agriculture — Forest Service — Rocky Mountain Region

11177 West 8th Avenue
P.O. Box 25127
Lakewood, CO 80225

1950

NOV - 7 1983

James F. Boatright
Deputy Assistant Secretary of the Air Force
Department of the Air Force
AFRCE-BMS/DEV, Norton AFB, CA 92409

Dear Mr. Boatright:

We have reviewed the Draft Environmental Impact Statement and the Planning Technical Report for the Peacekeeper in Minuteman Silos.

Our review indicates you have adequately disclosed the environmental consequences of the proposed action and alternatives on National Forest System lands, primarily the Medicine Bow National Forest in Wyoming. The environmental consequences you have identified are primarily increases in recreation use on the nearby National Forest System lands.

1208 We do have two minor suggestions for consideration. On Page 2-9 of the Technical Report, we suggest referring to outdoor recreational activities in the last sentence of Paragraph 2.3.2.1.2. Wyoming residents do travel to Colorado for recreational activities such as viewing professional sports, but we do agree that most Wyoming residents do not travel to Colorado or Nebraska for outdoor recreation activities such as hunting, fishing, camping, and hiking.

1187 On Page 2-44 in Paragraph 2.6.2.1.2, it would be more accurate to refer to National Forest System lands. The Forest Service is an agency responsible for managing National Forest System lands, but the title is held by the United States of America rather than the agency. This same comment applies to Paragraph 1 on Page 2-46 where the DEIS states" -- are owned and managed by the USFS, --." This same comment applies to Page 3-8 and Page 3-36, all in the draft Environmental Planning Technical Reports.

We do appreciate the fact that you have recognized the environmental consequence of the project on National Forest System lands.

Sincerely,

CRAIG W. RUPP
Regional Forester

6

U.S. Department of Housing and Urban Development
Denver Regional/Area Office, Region VIII
Executive Tower
1405 Curtis Street
Denver, Colorado 80202

November 1, 1983

Major Walsh
AFRCE-BMS/DEV
Norton Air Force Base, CA 92409

Dear Major Walsh:

Thank you for the opportunity to review and comment on the Peacekeeper in Minuteman Silos, 90th Strategic Missile Wing, F.E. Warren Air Force Base Draft Environmental Impact Statement.

1 Your draft has been reviewed with specific consideration for the areas of responsibility assigned to the Department of Housing and Urban Development. This review considered the proposal's compatibility with local and regional comprehensive planning and impacts on urbanized areas. Within these parameters, we find this document adequate for our purposes.

If you have any questions regarding these comments, please contact Mr. Howard S. Kutzer of my staff, at (303) 837-3102.

Sincerely,

Robert J. Matuschek
Director
Office of Community Planning
and Development, 8C

7

Federal Aviation Administration

1

8

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

46

987

9

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

DEC

In Reply Refer To:
ER-83/1328

Mr. James F. Boatright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)
Department of the Air Force
Washington, D.C. 20330

Dear Mr. Boatright:

This is in response to your request for review and comment on the draft environmental statement for Peacekeeper in Minuteman Silos, in Nebraska and Wyoming. From our review, the following areas in the EIS require additional attention.

Fish and Wildlife

1442 According to figure 3.2.2-1, there will be significant short-term and long-term effects on both State and federally listed threatened and endangered species. Chapter 3 dealing with project impacts is extremely sketchy. Due to the number of both plant and animal species involved and the fact that there are known or distinct possibilities of impact and/or destruction, there is an explicit need for further analysis and consideration of mitigation for affected species, both in the project area and further downstream.

1436 We note that under the Endangered Species Act, Section 7 consultation has been initiated and a biological assessment is in progress. We believe that the final environmental statement, however, should document the results of this consultation and should document which species are listed as endangered or proposed species, and provide a summary of probable project impacts to these species. Finally, any reference materials used in this regard should be documented so that public review is possible. Questions concerning endangered species should be directed to U.S. Fish and Wildlife Service, Endangered Species, P.O. Box 10023, Helena, Montana 59626.

1403 With regard to the environmental mitigating measures mentioned in the EIS, we recommend that all of the required and potential measures on pages 3-235 and 3-236, and on page 3-252, be adopted, and that all mitigation measures appear in the final environmental statement as a part of the proposed action.

1389 To schedule construction activity to minimize disturbance to raptor nests, we recommend the following protection periods for raptor nests of various species.

Golden eagle	February 15 - July 31
Prairie falcon	March 15 - July 31
Ferruginous hawk	March 15 - July 31
Swainson's hawk	April 15 - July 31
Burrowing owl	April 15 - July 31

Mr. James F. Boatright

1463 Page 3-243 points out that sand gravel removal from streambeds may impact aquatic resources. Since aggregate sources are generally available in nonaquatic areas, we recommend that aggregate removal not take place directly in any aquatic or riparian locations.

1401 The numerous references to potential petroleum and chemical spills, increased siltation, and turbidity and water quality changes throughout the draft environmental statement and the effect they may have on natural resources indicate potential problems for fish and wildlife resources from their aggregate or, sometimes, localized concentration. We recommend specific measures identified to prevent these occurences insofar as possible as well as specific measures that would be taken if they do occur, should be addressed in the final environmental statement.

Geology

There is some further attention we feel you should give to potential seismic events. With regard to regional seismicity, it is stated that "Algermissen and Perkins (1976) and Algermissen et al. (1982) indicate that the 475-year return period (10 percent chance of exceeding in 50 years) design acceleration would be about 0.04 g for the Cheyenne area" (pp. 2-118 and 2-120). The siting of Silo T-2 within the potentially active Wheatland-Whalen Fault Zone has been discussed in considerable detail, including the evidence for activity of the fault (p. 2-120, sec. 2.2.3.2.1.2), the map location of the fault with respect to Silo T-2 (fig. 2.2.3-3), and the probability of an accident as the result of ground rupture or ground motion (p. 1-30, last para.). However, the siting of an intercontinental ballistic missile silo on a potentially active fault zone is of sufficient concern that we believe the final environmental statement should include an evaluation of the following questions: (1) would the estimated seismic acceleration in a 50-year period at Silo T-2 1472 differ appreciably from the figure 0.04 g cited above; (2) if so, is it feasible to provide a 1473 specific estimate applicable to Silo T-2; (3) are additional investigations warranted or 1474 recommended in the vicinity of Silo T-2 or of the Wheatland-Whalen Fault Zone in order to establish a more definitive classification of the potential activity of the fault; (4) what ground acceleration was assumed in the design basis for construction of the silos, and particularly for Silo T-2; (5) is additional hardening or reinforcement of Silo T-2 1475 warranted during the modifications required for replacement of the existing missile with the Peacekeeper missile system; and (7) what are the environmental consequences of the 1471 maximum credible accident to Silo T-2 in the event of ground rupture or ground motion due to movement on the fault? We note that one of the issues identified during scoping was the "impact to silos from earthquakes" (p. D-3, issue no. [illegible]).

Mineral Resources

We agree that the impact of the project on mineral resources, with the exception of aggregate, would be insignificant. Additional land requirements for the project would be minimal, and production of known mineral resources, except aggregate, would not be affected. The draft properly focuses on aggregate resources. We believe significant impacts may occur to such resources owing to a considerably increased demand, coupled with limited production capacity and available resources in the region of influence.

1465 We estimate that requirements for the project in 1985, the peak year, would approach 20 percent of annual sand and gravel production in the region of influence. It is misleading

Mr. James F. Boatright

457 to claim that, "This peak-year demand represents 2 percent of current consumption" for the entire States of Colorado and Wyoming (sec. 3.1.4.4.2). Since current aggregate production in the development area is largely on an as-needed basis and comes from several small pits and quarries, we wonder if existing operations can adjust production to meet project demand as claimed. It may not be sufficient to assume simply (sec. 3.2.3.4) that, "sequential scheduling of proposed construction to fit the existing aggregate 1465 production capabilities over a reasonable period of time," will mitigate the effects of resource development in the region. Aggregate production capacity in the region may not be adequate to meet peak-year demands for the project as well as the continuing demands of existing consumers. We recommend that a survey be conducted to determine productive capacity and overall demand for aggregate in the region.

965 The data presented on coal production (in sec. 3.1.8.2.4) appear to be incorrect. According to the Wyoming Geological Survey, 108 million tons of coal were produced in Wyoming in 1982, which amounted to one-eighth of the U.S. coal production. Although Wyoming ranks among the leading coal-producing States, coal resources in the development area, in the Goshen Hole field, are relatively small and low in quality. No coal or lignite has been produced in Nebraska in recent years.

We trust these comments will prove helpful to you. Thank you for the opportunity to review this statement.

Sincerely,

Bruce Blanchard, Director
Environmental Project Review

10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

REPLY TO
ATTN OF: [illegible]

[illegible]

Under section 309 of the Clean Air Act, the EPA is required to review and comment on the environmental impact of the action proposed in the DEIS of the Peacekeeper.

The Region VIII office of the Environmental Protection Agency (EPA) has completed its review of the Peacekeeper in Minuteman Silos draft Environmental Impact Statement (DEIS). The following comments concerning the DEIS are provided in fulfillment by the U.S. Air Force in preparing the final Environmental Impact Statement (FEIS). Review comments provided by EPA Region VIII are included in this letter. Our collective comments and concerns are directed toward the impacts of proposed implementing actions and their alternatives, including development of mitigation measures.

Adequate discussion of projected social economic considerations is provided in the DEIS. We agree that emplacement of the command and control communication system and the upgrading and construction of surface transportation routes will provide short term water quality and air quality impacts. However, appropriate mitigation measures can significantly reduce these impacts. Our principal area of concern is the absence of definitive information associated with public health and safety related to the environmental impacts.

In our review, we feel that the proposed modification to the existing Minuteman III deployment area constitutes a major action, in that half of the existing launch facilities will undergo substantial modification and enlargement, as will certain support and storage facilities at F.E. Warren Air Force Base. Further, we can find no record of an environmental impact statement ever having been prepared for either the currently existing missile deployment or any other existing missile system deployment. Consequently, we 156 recommend that the FEIS assess environmental impacts for the entire 90th Strategic Missile Wing deployment area, and include the full range of public health and safety related environmental considerations which are normally explored in a NEPA-required EIS. Detailed emphasis should be given to peacetime accident potentials (radiological and non-radiological), and the consequences of such accidents.

We do not feel that the stated historical safety record provides either sufficient or applicable information when the significant differences between the Peacekeeper and Minuteman systems and the changes in transportation characteristics of the area during the referenced time period are considered. For EIS comparison purposes, it would be useful to reference the Rocky Flats Plant Site Final Environmental Impact Statement (DOE/EIS-0064), which was completed for continued operation and expansion decision making.

161 It is EPA's understanding that the System Safety Program for the Peacekeeper Missile System is the most extensive formal documented program for any missile system to date. This is a intergrated program which began during the concaptual phase and includes a large number of associated contractors. All of these contractors are guided by a safety document "SAMSO" Standard 79-1, Space and Missile System Organization. This document provides extensive safety analysis for the missle components, special handling equipment and facilities, and its transportation. The DEIS does not adequately address these issues. An industrial hazard control assessment should be written for the FEIS concerning each major component of the missle system.

Based on the system EPA uses for rating EIS's under its review, we have rated this DEIS as ER-2. This means that we have environmental reservations regarding a portion of the proposal, namely the assessment of environmental impacts associated with public safety and health.

We hope these comments and our enclosed detailed comments will prove useful to you in your preparation of the final EIS. Should you have any questions regarding our comments please contact Mike Hammer of my staff at FTS 327-2351.

Sincerely yours,

John G. Welles
Regional Administrator

Enclosure

Detailed Comments on the PeaceKeeper
In Minuteman Silos Draft Environmental Impact Statement

196 Page F-1 We suggest that the Uniform Relocation and Real Properties Acquisition Act be included in Appendix F of Federal Authorization Actions. This act requires that a relocation plan be provided for families who are displaced by a major Federal action. Further, we
191 recommend that a relocation plan be included in the FEIS.

Page S-7 Figure S-4. In general, we find that this and the other impact
34 matrices are of little value, and frequently raised more questions than they answer. The distinction between adverse impacts and significant adverse impacts is unclear, and this confusion is further aggravated by the three stage levels of the relative impacts. Further confusion is introduced with the provision of an unquantified potential for beneficial effects.

Page 1-29 The third paragraph states that only one transportation incident
167 involving a solid fuel ICBM has ever occurred, yet the third paragraph of page 1-33 states that five transportation accidents involving assembled missiles have occurred. This apparent discrepancy should be resolved.

Page 1-30 Second paragraph. Based on our review, we feel that the most
168 significant impacts would be from storage, transporation, or deployment accidents. However, the DEIS provides no information from which we can evaluate the consequences of an accidental release of plutonium or toxic material. If even a very small percentage of this inventory were aerosolized and dispersed by a fire in the silo, we are concerned that the affected area would likely extend well beyond 1750 feet - the exclusion area for inhabited buildings. The Rocky Flats Plant Site Final Environmental Impact Statement (DOE/EIS-0064) provides a good comparison for both radiological and non-radiological risk assessment.

190 Page 1-30 Third paragraph. What standards exist by which the Secretary of the Air Force can evaluate and grant an exemption from the Quantity Distance Criteria?

Page 1-31 First and second paragraph. What is the probability, from the
171 fault tree analysis, of the ignitions, penetrations, and leakages
163 cited in these paragraphs? What is the maximum credible accident (MCA) and what is the maximum area that would need to be evacuated
172 as a result of the MCA under adverse weather conditions? What are the projected inhalation and ingestion plutonium concentrations, and committed dose due to plutonium in lungs and in bones, at which the Air Force would commence protective actions to limit or avoid those projected doses?

162 Page 1-31 The third paragraph states that hydrogen gas resulting from battery charging will be continously re-circulated. Air containing hydrogen gas should not be re-circulated but vented directly to the atmosphere. We suggest that the FEIS provide the number of air changes required in the system to prevent explosive atmosphere from occuring.

159 Page 1-33 We suggest a discussion of possible accidents in the storage area be included here.

168 Page 1-34 The last paragraph states that one possibility of an accident involving toxics would be puncture of the sealed container of Stage IV which contains N_2O_4 and MMH. We suggest that a decontamination procedure be established to show how the spills (fuel and or oxidizer) would be chemically treated. Also how the toxic vapors would be prevented from becoming airborne or released to the atmosphere.

157 Page 1-36 We suggest a more complete discussion of offsite emergency response plans be included here, particularly with respect to radiological problems and coordination with offsite authorities.

1319 Alternatives have been considered and mitigative measures have been addressed in regard to the water quality impacts that construction activities of the silos would have on the water quality in Crow Creek (erosion-sedimentation). However, the document failed to discuss what type of monitoring plan would be implemented to ascertain whether the measures explored will in fact decrease the sediment loading into the stream. Additional attention should be given this aspect.

STATE OFFICIALS AND AGENCIES

11

STATE OF COLORADO

EXECUTIVE CHAMBERS
136 State Capitol
Denver, Colorado 80203
Phone 303-866-2471

Richard D. Lamm
Governor

November 25, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of Air Force, AFSCE-BMS
Norton Air Force Base, California 92409

Dear Major Walsh:

The Department of the Air Force is proposing to deploy 100 "Peacekeeper" missiles in the Minuteman missile launch facilities in Wyoming and Nebraska. This most recent proposed configuration for the MX is discussed in the Peacekeeper in Minuteman Silos Draft Environmental Impact Statement (DEIS). I reiterate my firm belief that there must be a comprehensive analysis of the impacts in Colorado of a nearby deployment of the MX. Because the DEIS fails to consider these impacts, I urge
22 that the study process be reconsidered. There should be full public
8 hearings in Colorado prior to the issuance of a Record of Decision, and a new revised DEIS should be produced that comprehensively considers the effects of the proposed project on Colorado.

Some of the "Peacekeepers" may literally be only a stone's throw from Colorado, but the current DEIS is virtually silent on the direct and indirect impacts that Colorado would be required to live with as a result of this project. In a June 22 letter to Lieutenant Colonel Tom Holycross and a follow-up telegram on July 5, 1983, I along with members of the Colorado Congressional delegation called for scoping meetings on this
14 project in Colorado. The purpose of the meetings would have been to initiate a constructive dialogue on issues of concern to the people of Colorado. We felt that it was unacceptable for the Air Force not to hold hearings in Colorado merely because present plans call for placing the missiles just across our borders in Wyoming and Nebraska. Unfortunately, these requests along with others from Senator William Armstrong, Congressman Hank Brown, Fort Collins Mayor Knezovich, Larimer County Commissioners, the Cities of Fort Collins and Greeley, and others have been unheeded.

Now that the DEIS has been released and reviewed, it is clear that the
80 document lives up to our worst fears by virtually ignoring Colorado. The borders of Colorado and Wyoming are unusual in that they do not follow ecological, geological or economic boundaries. Thus, there is no reason

to assume that environmental, social and economic impacts of the MX deployment would stop at state lines. In fact, deployment of the
80 missiles will certainly have serious impacts on Colorado. I do not believe that preparation of detailed environmental studies along political rather than logical environmental boundaries is consistent with the intent of the National Environmental Policy Act or the Council on Environmental Quality Regulations for Implementing The Procedural Provisions of NEPA. Although the DEIS identifies "Regions of Influence" ranging far into Colorado, there are minimal references to and almost no
81 data on regional impacts. Because of its failure to consider potential impacts on Colorado, the "Peacekeeper" DEIS is grossly inadequate as a decision-making tool and represents an insufficient attempt by the Department of the Air Force to fulfill its responsibilities under the National Environmental Policy Act.

Following is a summary of our specific concerns with the DEIS.

Social and Economic Impacts

After Cheyenne, Colorado's Front Range north of Denver is the nearest concentration of population to the proposed MX deployment. Fort Collins, only 50 miles from the Wyoming border, is clearly in an area of potential regional impact. This city may be significantly affected by MX construc-
432 tion, by an increase in train and truck traffic, by a temporary influx of construction workers and their families, and by a possible boom-bust economic cycle. Businesses may be deterred from locating in northern
109 Colorado if the area becomes a major nuclear target. These issues need to be considered in the DEIS and we should have an opportunity to discuss them in a public forum.

Transportation

The transportation section of the document states that several bridges in the project area may require alteration to accommodate oversized vehicles. This raises the question of what routes will be used to get the
982 oversized vehicles to the deployment area. Do any of the transportation routes go through Colorado and if so, will any alterations to transportation facilities in Colorado be required? The DEIS must also address the
983 routes contemplated for the movement of hazardous and nuclear materials which in all likelihood will be transported through Colorado along the densely populated Interstate-25 highway corridor.

Recreation

1179 Even though the map on page 2-67 of the DEIS shows that there would be regional impacts on recreation which would extend south of Denver, the document lacks data to determine what the impacts would be. The impacts

1179 on recreation in Colorado would be driven by the increase in population resulting from the project. These aspects of the MX project should be clearly defined in the DEIS.

Water Resources

The DEIS clearly states at page 3-219 that an impact on water resources will be considered significant if "it will reduce availability to, or interfere with, existing users creating a situation the user is unable to respond to." The "Peacekeeper" project will cause a substantial increase
1300 on water use in the Crow Creek basin which in time will reduce the water available to Coloradans who obtain water from the basin. The DEIS fails to recognize that water users in Colorado would not be protected from injury due to the increased withdrawals from Crow Creek by either Wyoming water laws or by any interstate compacts. At a minimum, the Air Force should develop effective mitigation measures to alleviate injury to water users in Colorado.

On Page 3-224, the DEIS comments that the projected long-term operating demand for water will create a water shortage in the Cheyenne Urban Area
203 earlier with the project than without it. In the draft environmental planning technical report, it shows that water will be imported from the Little Snake River by exchange to help meet the long-term water requirements for the area, including the project's water needs. We believe the DEIS should indicate this and should discuss the fact that water diversions from the Little Snake River are subject to the provisions of the Upper Colorado River Compact. The compact apportions the water in the Little Snake River between Colorado and Wyoming.

Wildlife

1368 Wildlife does not recognize political boundaries, but as a result of the reliance of the DEIS on such artificial boundaries, potential direct and indirect impacts on wildlife in Colorado are ignored. Proposed disturbances in Wyoming or Nebraska may permanently alter herd movements,
1369 raptors' hunting patterns and waterfowl breeding patterns, thus affecting resident Colorado populations. Poaching, dog kills, highway mortality,
1371 and hunting pressures are also likely in Colorado. Alterations in north-south drainages in the study are may affect Colorado fisheries, some of
1388 which include state listed threatened fish species. There also may be adverse consequences for the Greater Prairie Chicken, a state listed endangered species. All known Colorado populations of the species are close to the study area and because of their small numbers, any impacts may threaten their survival. The effects of the project on Colorado, big
1370 game, nongame, fur bearers, upland game, waterfowl, raptors, fisheries, and threatened and endangered species should all be addressed in the DEIS.

Vegetation

The DEIS recognizes that habitat for Gaura neomexicana, the Colorado butterfly plant, will be disturbed during construction of road and utility corridors and that this will cause significant, long-term impacts. Although the plant is not yet federally listed as endangered, I understand that it qualifies for listing since all known populations of this species (except for a 1979 Colorado siting of one individual) occur within the area of the proposed MX project. This once common Colorado
1425 species, now all but extirpated from Colorado by agriculture, should be treated as an endangered species. Any proposed north-south transportation corridors crossing Crow and Diamond Creeks should be relocated downstream from the known populations of this species since construction upstream could cause its extinction. New locations for the corridors should be identified and included in a revised DEIS as necessary mitigation measures to protect this rare species of plant life.

Geologic Hazards

The DEIS dismisses the issue of seismicity in the area as being insignificant. The State Geologist advises that the studies used are unreliable. Evaluations based on probabilities in wide areas where recorded earthquakes have been few and brief are questionable. This judgment is supported by the fact that the DEIS sources treated the area
1476 of the recent Mt. Borah earthquake near Challis, Idaho, as having about the same bedrock acceleration values as the southeastern Wyoming area, suggesting that earthquake potential was low in both places. Whether the Idaho earthquake was in fact a very rare event, or the low values of acceleration were statistical aberrations resulting from too short a period of instrumental earthquake data, the problem is the same. The maps used are not appropriate or adequate for critical facility siting and design.

An even more serious problem is that the Wheatland-Whalen Fault Zone intersects one of the missile complexes; three silos are to be in or near the fault zone. The DEIS mentions a 1960 USGS finding that this is an active fault zone and makes the observation that if the fault is
1471 active there may be ground rupture. In the absence of definitive findings to the contrary, it would seem proper and prudent to assume that the fault is active and potentially seismogenic. Minimal safeguards might include eliminating "Peacekeeper" use of silos in or reasonably near the fault zone or designing structures to withstand the maximum earthquake that is probable in the area.

Fire Hazards

135 The DEIS fails to address the potentially serious effects of a major fire or other catastrophe within a missile silo which could cause release of plutonium or other hazardous substances. Off-site impacts of such an incident may be within the purview a Memorandum of Understanding 154 between Warren Air Force Base and the Colorado Department of Military Affairs, Division of Disaster Emergency Services. However, the DEIS does not assess the possibility and consequences of any such occurrence involving the MX silos.

Nuclear Attack or Accident

37 Perhaps the most remarkable omission from the DEIS is its failure to discuss the increased probability of nuclear attack or accident and the consequences for the entire area including Colorado. Surely the location of an array of "Peacekeeper" missiles will be an attractive target for nuclear attack, the devastating effects of which would be of horrendous porportions. Furthermore, the missiles may malfunction, misfire, or be 164 accidentally triggered. As unpleasant as it may be to do so, these dire possibilities must be considered in an adequate DEIS.

81 There are obviously many ways the MX project can and will affect Colorado. But the scant treatment of the consequences of the proposed project for Colorado is shallow and inadequate for NEPA purposes. Consideration of the concerns raised in this letter and others require a substantial amount of additional analysis which should be undertaken immediately. There should be an opportunity for full public scrutiny and comment. This is necessary to fulfill the Air Force's obligations under 22 NEPA and its public responsibility to the people of Colorado

8 The State of Colorado requests that the Department of the Air Force withdraw the DEIS, perform the additional anelyses called for, hold full public hearings in Colorado, in addition to Wyoming and Nebraska, and issue a revised DEIS for further public comment. No final decision on 22 the MX system as presently planned should be reached until these important steps have been taken

Sincerely,

Richard D. Lamm

RDL:jc

cc: Governor Ed Herschler, State of Wyoming
Governor Robert Kerrey, State of Nebraska
Colorado Congressional Delegation:
Senator Gary Hart
Senator William Armstrong
Representative Patricia Schroeder
Representative Timothy E. Wirth
Representative Ray Kogovsek
Representative Hank Brown
Representative Ken Kramer
Representative Dan Schaefer

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR 12

November 23, 1983

Major Peter Walsh
AFRCE-BMS/DEV
Building 520, Room 122
Norton AFB, California 92409

Dear Major Walsh:

The agencies of the State of Nebraska appreciate the opportunity to comment on the Draft Environmental Impact Statement related to the deployment of the MX missiles in western Nebraska. Their comments are attached.

Nebraska state government will be following the development of the Final Environmental Impact Statement to insure that Nebraska's interests are addressed adequately. The final draft of the Wyoming Nebraska Socioeconomic Impact Statement will also be reviewed with our continuing concerns as expressed in the various Nebraska meetings, November 8, 9 and 10, with the Air Force representatives and the consultants.

192 We are concerned that the five families whose buildings lie within the quantity distance zone be equitably treated in the event that relocation is recommended. The fact that this problem was not outlined until the release of the DEIS underscores the need for accommodating relief from the Air Force.

We appreciate the cooperation shown by the Air Force and its consultants in preparing these documents and in working with the Intergovernmental Executive Impact Council and its various working groups. I look forward to continued cooperation throughout the project as we work together to protect the state's interests.

Sincerely,

Robert Kerrey
Governor

RK:mbv

Attachments

OFFICE OF THE GOVERNOR, BOX 94848, LINCOLN, NEBRASKA 68509-4848, PHONE (402) 471-2244

13

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

GOVERNOR

November 22, 1983

Peter Walsh, Major, USAF
Director, Environmental Planning Office
AFRCE - BMS/DEV
Norton Air Force Base, CA 92401

Dear Major Walsh

Enclosed are copies of state agency comments on the Peacekeeper in Minuteman Silos draft environmental impact statement. As you can see, there is a great deal of work to be done before the environmental impact statement can be finalized in an adequate form.

First and foremost, it must be recognized that the impact statement is an essential tool to the development and refinement of project mitigation strategies. Agency concerns regarding adequacy of baseline information, inaccuracy and lack of specificity in the project impact projections, and lack of methodological explanation and documentation must be resolved in order to define and 7 implement an effective mitigation program. I request that the documents' authors and consultants meet face-to-face with the respective state agencies, on an individual basis, to discuss and resolve the specific agency concerns in these areas. These meetings should take place as quickly as possible, no later than December 2[illegible]

Avoidance of recognized problem areas is often the cheapest mitigation strategy. Many of the project's socioeconomic and environmental concerns revolve around three populations: (1) the inmigrant direct project 225 workers, (2) the weekly commuter direct project workers, and (3) the transients and unemployable job seekers attracted to the area in search of jobs or to be where the action is for other purposes. Problems associated with the inmigrants and weekly commuters can be significantly reduced if the Air Force makes a strong commitment, both on

Peter Walsh, Major, USAF
November 22, 1983
Page 3

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Peter Walsh, Major, USAF
November 22, 1983
Page 4

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Ed Bernacki



STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

14

MEMO

TO: Secretary of State Allen J. Beermann

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, plese contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

---

1 We have reviewed the Draft Environmental Impact Statement.

RECEIVED
OCT 13 1983
POLICY RESEARCH

☒ No comment.

☐ Comments are attached.

Name Allen J Beermann Title Secretary of State

Office Department of State

Address Suite 2300 - Capitol Date Oct 12-83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER



STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

15

MEMO

RECEIVED
SEP 26 1983
POLICY RESEARCH

TO: Secretary of State Allen J. Beermann

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me.

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

☐ No comment.

☐ Comments are attached.

Contact person _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

16

MEMO

TO: Senator Elroy M. Hefner

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

---

1 We have reviewed the Draft Environmental Impact Statement.

☒ No comment.

☐ Comments are attached.

RECEIVED
OCT 14 1983
POLICY RESEARCH

Name [illegible] Title [illegible]

Office [illegible]

Address [illegible] Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
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17

THE NEBRASKA LEGISLATURE

from the desk of

Marge Higgins
Senator, District 9

RECEIVED
NOV 08 1983
POLICY RESEARCH

November 7, 1983

Gayle Malmquist
Policy Research Office
Room 1321
State Capitol

Dear Ms. Malmquist:

60 Methusla lived 900 years and even he wouldn't have time to read this.

Sincerely,

Marge Higgins

MH:hw

18

1 We have reviewed the Draft Environmental Impact Statement.

☒ No comment.

☐ Comments are attached.

RECEIVED
NOV 02 1983
POLICY RESEARCH

Name Ray P. Lundy Title State Senator

Office [illegible]

Address [illegible] Date Oct. 28, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

19

MEMO

TO: Senator Shirley Marsh

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

---

1 We have reviewed the Draft Environmental Impact Statement.

☒ No comment.

☐ Comments are attached.

RECEIVED
NOV 03 1983
POLICY RESEARCH

Name Shirley Marsh Title State Senator

Office Sen 1615

Address State Capitol Date 11/20/83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

20

1 We have reviewed the Draft Environmental Impact Statement.

☒ No comment.

☐ Comments are attached.

Name _____ Title _____

Office _____

Address _____ Date _____

RECEIVED
OCT 19 1983
POLICY RESEARCH

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

21

1 We have reviewed the Draft Environmental Impact Statement.

☐ No comment.

☐ Comments are attached.

Name _____ Title _____

Office _____

Address _____ Date _____

RECEIVED
1983
POLICY RESEARCH

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

...e State of Wyoming

Department of Education — Hathaway Build... — Cheyenne Wyoming 82002

...ynn Simons

22

...tober 3, 1983

MEMORANDUM

TO: State Planning Coordinator

FROM: Lynn Simons

SUBJECT: Wyoming and Nebraska Socioeconomic Impact Study, Peacekeeper in Minuteman Silos, Laramie County School District No. 1, 13.8.1-13.8.1.4

611 We have reviewed the study and found it to be specific as to what might happen in the community with the advent of the Peacekeeper missile. The mitigative measures which are proposed, however, are general. If the assumptions made in the study prove to be correct, we believe that the following mitigative measures should be offered for consideration:

- A land study should be undertaken to identify potential school sites. $ 25,000
- A new three (3) section elementary school should be built in the Rossman school area. 3,500,000
- An additional five (5) acres should be purchased at the Arp School site, and 15,000 square feet should be added to the school. 1,205,500
- Carey Jr. High School should be expanded into Eastridge which would then require a new gym and a new media center. 700,000
- Eastridge children should be moved to Henderson when Anderson is completed.
- A new gym and library should be added to East High School. 950,000
- Vocational classrooms should be added to Central High School. 700,000

The district's per pupil cost last year was $2,398. If 942 new students enter the district, the additional cost for operation at last year's rate will be $2,424,116. This year's costs, of course, will be higher because of the new state foundation program.

LS:rc

23

The State of Wyoming

Department of Education — Hathaway Building — Cheyenne Wyoming 82002

Lynn Simons
Superintendent of Public Instruction

November 14, 1983

TO: State Planning Coordinator

FROM: Lynn Simons

SUBJECT: Environmental Impact Statement-Peacekeeper In Minuteman Silos

392 I have reviewed the draft and have the following comments for your consideration. The department and the local school district were not consulted in regard to school finance until after the draft was released. The school finance sections are fraught with errors. I do not want to concern myself with minutiae, because most of the sections will have to be rewritten, but I will give you a few examples:

The projected revenue table on 3-56 has no correlation with the enrollment projections on 3-95. In fact, I don't know what methodology was used to project revenues.

On page 3-49 the district can levy two additional mills upon voter approval not one as stated.

On page 3-56 state land income should be counted as a local resource to give a clearer picture of the state foundation program.

The definitions for the public finance summary impact matrix and the public service and facilities summary impact matrix are different. Surely there must be a correlation between finance and facilities. For uniformity's sake, I believe the definitions should be the same.

I have limited my comments for the sake of brevity, however, I would like to state that the department and the local school district, I am sure, stand ready to assist the Air Force's consultant.

I strongly recommend that the consultant contact the department immediately so that we can assist him in preparing the final impact statement.

I hope that the final impact statement will succinctly deal with revenues and expenditures in a manner consistent with the high standards of education Wyoming students are entitled to.

I have attached our mitigation comments for the Wyoming and Nebraska Socioeconomic Impact Study. I believe these comments are also appropriate for the draft environmental impact statement.

LS:rc

The State of Wyoming

Lynn Simons
[illegible]

Department of Education — Hathaway [illegible] — Cheyenne, Wyoming 82002

October 13, 1983

MEMORANDUM

TO: State Planning Coordinator

FROM: Lynn Simons

SUBJECT: Wyoming and Nebraska Socioeconomic Impact Study, Peacekeeper in Minuteman Silos, Laramie County School District No. 1, (3.8.1-3.8.1.4

We have reviewed the study and found it to be specific as to what might happen in the community with the advent of the Peacekeeper missile. The mitigative measures which are proposed, however, are general. If the assumptions made in the study prove to be correct, we believe that the following mitigative measures should be offered for consideration:

. A land study should be undertaken to identify potential school sites.	$ 25,000
. A new three (3) section elementary school should be built in the Rossman school area.	3,500,000
. An additional five (5) acres should be purchased at the Arp School site, and 15,000 square feet should be added to the school.	1,025,000
. Carey Jr. High School should be expanded into Eastridge which would then require a new gym and a new media center.	700,000
. Eastridge children should be moved to Henderson when Anderson is completed.	
. A new gym and library should be added to East High School.	850,000
. Vocational classrooms should be added to Central High School.	700,000

The district's per pupil cost last year was $2,995. If 987 new students enter the district, the additional funds for operation at last year's rate will be $2,824,186. This year's [illegible] of course, will be higher because of the new state foundation program.

LS rc

Supreme Court of Wyoming — 24
Cheyenne, Wyoming 82002

JOHN J. ROONEY, CHIEF JUSTICE

September 27, 1983

State Planning Coordinator's Office
2320 Capitol Avenue
Cheyenne, WY 82002

Attn: Mr. Paul Cleary

In re: MX Impact Document Review

Dear Mr. Cleary:

A copy of the Wyoming and Nebraska Socioeconomic Impact Study was forwarded to the Court on September 15, 1983 for the review and comments by the Court. The comments that follow in this letter concern the criminal justice systems within the four Wyoming counties affected, i.e., Laramie, Albany, Platte and Goshen Counties. We are presently not aware of the type of the contemplated increased activity or population. Perhaps it will be so minimal as to make adjustments for any governmental entity unnecessary. Section 1.3 of the study would seem to so indicate. However, other portions of the study seem to anticipate increased activity, wherefor the following comments may be appropriate.

687 The study indicates that the law enforcement activities within the impacted area will increase. If so, the court activities will likewise increase at the same rate. The study doesn't reflect this relationship, but every arrest requires some court action--warrants, hearings, and ultimate trial or disposition without trial.

688 The study also does not mention the district courts within the four counties, nor the Wyoming Supreme Court, all of which could be affected by the MX impact. If the caseloads increase in the courts of limited jurisdiction, there will be appeals to the district courts and to the Wyoming Supreme Court from the action of the courts of limited jurisdiction. The district courts will have more cases to handle, since the increase in criminal activity will not be limited to misdemeanors. The daily workload of the district courts will also be heavier, since the handling of felonies requires more time and money than do misdemeanor trials.

688 The study treats only the criminal impact, but with the additional population and people activity there will be an increase of district court civil matters, i.e., divorces, child neglect, tort actions (automobile accidents, etc.), contract and related leasing or purchasing problems and landlord-tennant problems. The same holds true for the civil jurisdiction of the courts of limited jurisdiction, and the resulting appellate activity will increase the work of the Supreme Court.

686 On page 3-20 of the study in Table 3.1.3-1 (and at other places), reference is made to "Total cases filed/pending", "Total cases disposed" and "Percentage of cases disposed" in the Laramie County Court. The presentation of this data in this format creates an erroneous impression with reference to the pace of court work. Cases "filed/pending" include cases pending at the beginning of the period. There will always be some of them. A court could dispose of more cases than were filed in a given year, by cutting down on the amount pending. In other words, a court could be disposing of as many cases as are filed and always carry a pending load of 2,000. Your format reflects the court to be falling behind and this may not be true. In addition, the figures that are shown in Table 3.1.3-1 on page 3-20 of the study are incorrect and the correct figures are shown below:

Total cases filed/pending	15,393
Total cases disposed	13,975
Percentage of cases disposed--(as it pertains to new cases filed and cases pending at start of period)	85.9

682 The study recognizes that there will be an increase caseload for Laramie County Court and recommends that the impact could be mitigated by having night court hours and part-time judges. However, except for overtime work, part-time judges are useless without an extra courtroom and extra support facilities being available.

685 On page 5-35 of the study, reference is made to the criminal justice system for the Torrington municipal court. The study states that "the Torrington Municipal Court handles approximately 125 cases per month or 1,500 cases per year". The correct figures are 250 cases per month or 3,000 per year.

817 On page 6-6, paragraph 6.1.3 of the study, reference is made to the criminal justice system for Albany County. The study states that "the Albany County Justice Court handles approximately 400 cases per month". The figure should be 600, according to our records. It should also be noted that the Albany County Board of

816 County Commissioners has recently elected to establish a county court system, effective July 1, 1984. Since the county court system is state funded, the 1984 legislative budget session will necessarily have to approve an appropriation for the funding of the county court system for Albany County. We would expect the legislature to make the necessary appropriation. The establishment of the county court system in Albany County would insure a court system that should be able to handle any impact resulting from the MX installation.

Please advise if you desire any further comment.

Very truly yours,

John J. Rooney
Chief Justice

JJR, RLD/glr
cc

25

Supreme Court of Wyoming
Cheyenne, Wyoming 82002

JOHN J. ROONEY, Chief Justice

October 25, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Attn: Mr. Paul Cleary

In re: MX Draft Environmental Impact Statement

Dear Mr. Cleary:

A copy of the Draft Environmental Impact Statement was forwarded to the court on October 13, 1983 for the review and comments by the court. The comments that were contained in my previous letter to you of September 27, 1983 in re MX Impact Document Review would also apply to the Draft Environmental Impact Statement. In addition to those comments, it should also be pointed out that the Draft Environmental Impact Statement contains additional incorrect statistical information. On page 2-23 of the statement, reference is made to the annual caseload of Laramie County Court. The statement is made that "The County Court's annual caseload is about 8,800 of which over 90 percent are traffic violations. The majority of dispositions are by forfeiture and guilty plea. Case backlog is 23 percent of the total indicating that the Court is now at capacity. Staffing consists of two full-time judges and one part-time support person." This is not accurate. 533

According to our statistics for the Laramie County Court, the annual caseload is 15,393, of which approximately 68.2 percent are traffic violations. The majority of the traffic violations are disposed of by forfeiture and guilty pleas. The case backlog is 10 percent of the total and the court is maintaining its caseload without any delay. Staffing for the county court consists of two full-time judges together with five full-time clerks and one part-time clerk, together with backup by the Fiscal Control Office of the Supreme Court.

Based on the projected activities as reflected in the Draft Environmental Impact Statement, we question the potential for any material impact. But if one should develop, the judicial system will be involved. If the impact is not major, the judicial system can accommodate it without any change in its present capacity. Of course, if it is major, the capacity may require an increase, i.e., more money and manhours. 534

Very truly yours,

John J. Rooney
Chief Justice

JJR/RLD/glr.
cc

26

[redacted]

DIVISION OF SCIENCE & MATHEMATICS

[illegible] 69337 [illegible]

26 November 1983

Major Peter Walsh
Director, Environmental Planning Division DE
Department of the Air Force
HQ SAC/DEPV
Norton Air Force Base, California 92409

Dear Sir:

I have been asked by a number of people in western Nebraska to review The Draft Environmental Planning Technical Report, Biological Resources, and the Biological Resources Section of the MX DEIS.

Due to the fact that I have been hospitalized recently, I haven't had time to review these documents to the extent that I would like. The following observations, however, are still relevant:

1. These documents rely very heavily on available literature for western Nebraska. The unfortunate facts of life are that the literature regarding the biological resources of the area is unavailable, much too brief when available, or out of date. This comment applies particularly to plants. While research is in progress here on a number of aspects that would affect the data base positively, it would appear that these documents are inadequately prepared in terms of "ground-truthing". Basic field work for determining environmental impact of MX missile development in western Nebraska appears to be inadequate. Field survey for rare, endangered or threatened species in Nebraska appears to be incomplete. 1415

2. Aspects regarding restoration of vegetation following construction are not discussed thoroughly enough. Assessment of potential environmental damage, especially damage to vegetation, appears therefore to be inadequate. 1372

3. My impression is that comprehensive biological surveys for the streams of western Nebraska are not available. Thus baseline data for non-game fish, benthic macroinvertebrates and other biological indicators of water quality are actually not extant. Environmental impacts on these streams due to construction activity thus would be difficult if not impossible to estimate. 1416

4. We have had several projects underway for several years, the successful conclusion of which may be helpful to the Department of the Air Force as it may attempt to upgrade the quality of its draft environmental impact analyses. A graduate student, Joyce Phillips Hardy, is preparing a vegetation and flora of Banner County, Nebraska, as her Master's Thesis, with Dr. James Stubbendieck of the University of Nebraska. 1417

CHADRON STATE COLLEGE Chadron, Nebraska 69337

We as representatives of Natural Resources Enterprises, Inc. [illegible] have a contract to accomplish vegetational analysis and management recommendations for Scotts Bluff and Agate Fossil Beds National Monuments. In addition, The Chadron State College Research Institute has funded research on the rare plants of western Nebraska. If these studies are deemed to be helpful, please let us know. 1417

Yours truly,

Ronald R. Weedon

Dr. Ronald R. Weedon
Curator of the Herbarium
Professor of Biology

cc: The Hon. Robert Kerrey
Dr. F. Ferguson
Dr. E. Nelson
Mr. John Williams

27

COLORADO HISTORICAL SOCIETY

The Colorado Heritage Center 1300 Broadway Denver Colorado 80203

November 23, 1983

A. V. Eggers
Resource Specialist
URS-Berger
3+6 West Hospitality Lane, Suite 300
San Bernardino, California 92408

Dear Mr. Eggers:

This office has reviewed your correspondence of November 22, 1983 and the draft environmental impact statement for Peacekeeper in Minuteman Silos at Warren Air Force Base, Wyoming.

1274 Since no ground disturbing activities are to take place within the State of Colorado, this office finds that there will be no effect to Colorado's cultural resources by the proposed project.

If this office can be of further assistance, please contact Jim Green at 866-3392.

Sincerely,

Barbara Sudler
State Historic Preservation Officer

BS:WJG:ss

28

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • MAJOR GENERAL EDWARD C. BINDER • DIRECTOR

RECEIVED
OCT 25 1983
POLICY RESEARCH

24 October 1983

Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, Nebraska
68509-4601

Dear Gayle:

1 Thank you for the opportunity to review the Draft Environmental Impact Statement, Peacekeeper in Minuteman Silos, October, 1983.

The State Civil Defense Agency basically concurs with the impact statement "the proposed project would not require any change to the present civil defense program in the area". We offer no additional impact statements to the draft material. Basically, there is no change in civil defense preparedness required due to the placement of MX missiles rather than Minuteman III missiles.

We would appreciate receiving a copy of the review distribution list to which you referred in your letter of 7 October, 1983.

Sincerely,

Frances A. Laden
Assistant Director

STATE CIVIL DEFENSE AGENCY, 1300 MILITARY ROAD, LINCOLN, NEBRASKA 68508-1090, PHONE (402) 471-3
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • MAJOR GENERAL EDWARD C. BINDER • DIRECTOR

29

RECEIVED
OCT 3 1983
POLICY RESEARCH

30 September 1983

Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, NE 68509-4601

Dear Gayle:

For the General, I thank you for the opportunity to review and comment on the WYOMING AND NEBRASKA SOCIOECONOMIC IMPACT STUDY (PEACEKEEPER).

820 We offer a suggested change in Volume II, page 7-57, Section 7.7.2.1.1, para 3, "...St. Elizabeth's in Omaha". It probably should read "St. Elizabeth's in Lincoln".

It is apparent that no significant impact will be felt on existing socioeconomic systems as a result of the Peacekeeper project.

If possible, we would like to receive a copy of the distribution list of all agencies who received copies of the study. By knowing who has the opportunity to review such documents we will be sure to not duplicate the review process.

We look forward to receiving the Environmental Impact Statement sometime in early October.

Sincerely,

Larry E. Redrow
Plans & Programs Officer

STATE CIVIL DEFENSE AGENCY, 1300 MILITARY ROAD, LINCOLN, NEBRASKA 68508-1090, PHONE (402) 471-3
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

NEBRASKA ARTS COUNCIL

30

September 28, 1983

RECEIVED
SEP 30 1983
POLICY RESEARCH

Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, NE 68509-4601

Dear Gayle Malmquist

Thank you for the opportunity to comment on the "Wyoming and Nebraska Socioeconomic Impact Study," for the MX missle sites

1246 I am concerned that the impact on arts and cultural activities is not addressed in the document. A complete profile of communities and/or regions must include the arts and cultural opportunities. I feel, therefore, that the effect of the MX missle project on the cultural and artistic facilities, services, programs and resources of the area should be examined. This would be the joint responsibility of the Wyoming State Council on the Arts and the Nebraska Arts Council.

Presumably those who conducted the study assumed that arts and culturally related activities are not of interest or importance to the people in the affected area. However, the availability of these activities is of even more importance to people in rural areas than it is to those who can comfortably travel to Denver and Omaha for such activities. And it is their distance from the metropolitan areas combined with the sparse population that makes it so costly for the Nebraska Arts Council and the Wyoming State Council on the Arts to get arts and cultural activities to them. The West Nebraska Arts Center (WNAC) in Scottsbluff is the only local organization serving the area (including most of the affected area in Wyoming). Last year the WNAC served approximately 20,000 people

Please let me know what I can do to make sure that consideration of arts and cultural activities is part of this process

Sincerely,

Robin Tryloff
Executive Director

cc: Martha Beaman
David Fraher

RT/mpb

1313 FARNAM ON-THE-MALL
OMAHA, NEBRASKA 68102-1873
(402) 554-2122

Robert Kerrey, Governor of Nebraska
LaVon S. Crosby, Chairman
Robin Tryloff, Executive Director

31

We have reviewed the Draft Environmental Impact Statement.

1 ☑ No comment.

☐ Comments are attached.

RECEIVED
POLICY RESEARCH

Name _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

32

Please return by September 30, 1983

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☑ No comment.

☐ Comments are attached.

RECEIVED
POLICY RESEARCH

Contact person Ray A. C. Johnson Title Auditor of Public Accounts

Office Auditor of Public Accounts

Address Room 2303 - State Capitol Date September 26, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

33

Please return by September 30, 1983

RECEIVED
POLICY RESEARCH

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☑ No comment.

☐ Comments are attached.

Contact person _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
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34

NEBRASKA COMMISSION ON THE STATUS OF WOMEN

P.O. Box 94985, 301 Centennial Mall South Lincoln, Nebraska 68509
(402) 471-2039

November 7, 1983

Jayle Malmquist
Policy Research Office
State Capitol Building
Room 1321, Box 94601
Lincoln, Nebraska 68509

Dear Jayle,

Thank you for sending us the copy of the Environmental Impact Statement-MX Missiles.

Although the Commission on Women has not formally expressed an opinion on the installation of the MX Missiles in our state, we do have some concerns that can be associated with the expected increase in personnel that will come with this effort.

556 An avalanche of people in any area can expect to cause an avalanche of problems and increased needs. Our concern is that attention and planning include these projected needs. Will there be accompanying funding and planning to provide programs for domestic violence, child abuse and neglect, aid to dependent children, the elderly, sexual assault, and mental health counseling? Will planning include increased health care services and child care programs?

Services and support programs are already thin in the more sparsely populated western part of our state. Will the available services stretch as far as may be required? Or will other options be available?

We trust that consideration and concern for these issues will be a part of the planning process as this project moves along. The Nebraska Commission on Women welcomes any opportunity to participate when the concerns of women and their families are involved. Please keep us informed.

Sincerely,

Jean O'Hara
Executive Director

JO/td

RECEIVED
NOV 09 1983
POLICY RESEARCH

EQUAL OPPORTUNITY EMPLOYER

Robert Kerrey, Governor
Jean O'Hara, Executive Director
Rose Arends, Assistant Director for Administration
E. Sheldon Stanton, Assistant Director for Programs

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

35

RECEIVED
OCT 12 1983
POLICY RESEARCH

[illegible]

1 [X] No comment.
[ ] Comments are attached.

RECEIVED
[illegible] 1983
POLICY RESEARCH

Name [illegible]
Title [illegible]
Address [illegible]

Policy Research Office, Room 1323 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • [illegible] • DIRECTOR

RECEIVED
SEP 27 1983
POLICY RESEARCH

36

MEMO

TO: Merritt Green

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me.

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.
[X] No comment.
[ ] Comments are attached.

Contact person [illegible] Title [illegible]
Office [illegible]
Address [illegible] Date [illegible]

Policy Research Office, Room 1323 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

[illegible] • GOVERNOR • STEVE FOWLER • DIRECTOR

37

RECEIVED
[illegible]

[illegible]

1 [X] No comment.
[ ] Comments are attached.

Name Jerry Bare
Title Budget Officer
Address Room 1323 State Capitol

Policy Research Office, Room 1323 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • JOHN R. [illegible] • DIRECTOR

38

RECEIVED
[illegible] 1983
POLICY RESEARCH

MEMO

TO: Gayle Malmquist

FROM: John R. [illegible]

DATE: September [illegible], 1983

SUBJECT: Wyoming - Nebraska Socioeconomic Impact Study
Peacekeeper in Minuteman [illegible]

I have had my staff review the three volumes of the Department of the Air Force study. The review has followed the guidance contained in the last four lines of paragraph [illegible] of the following comments are attached.

1093 1. Paragraph [illegible] Airport at Kimball does not mention the National Airport System Plan prepared by the [illegible] Department of Transportation which identifies the need for [illegible] of all of improvements at the Kimball Airport.

1018 2. Numerous roads cross the area of western Nebraska included in the study. The absence of [illegible] comment on air routes in section [illegible] of the report may not be significant in as the Department of the Air Force exists to air operations. This Department would be much better able to assess [illegible] & ways and by which [illegible] in the area where additional [illegible] would [illegible] of the roads that were not used which may [illegible] the presence and [illegible] states of impact. A comment summarizing [illegible] chart is attached for your use.

[illegible] the form you requested, but it may be [illegible] service.

DEPARTMENT OF AERONAUTICS

[illegible]

AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • JOHN R. AUER • DIRECTOR

39

RECEIVED
SEP 1983
POLICY RESEARCH

September 16, 1983

Gayle Malmquist
Policy Research Office
P.O. Box 94601
Lincoln, Nebraska 68509-4601

Subject: Draft Environmental Impact Statement
MX Missiles - Nebraska

Dear Gayle:

A representative from this Department attended the meeting you sponsored on 8 November 1983 with representatives of the Air Force and their consultant. This meeting discussed the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) which we understand will be part of the Environmental Impact Statement (EIS). Our comments concerning the WNSIS are applicable to the EIS and were forwarded to you in our memo dated September 30, 1983.

1018 An additional comment concerning the Air Force's statement made at the 8 November meeting must be addressed. The Air Force's comment was that the Federal Aviation Administration (FAA) now has a restriction of flight level operations over missile sites. That this restriction will not change. This Department is not aware of any such restrictions. The FAA does have a minimum flight level operation over populated areas. This restriction does not apply to remote areas in western Nebraska unless they are identified on aeronautical charts. Missile sites are not identified on aeronautical charts. In addition this Department licenses aerial applicators whose operation requires low level flying when they routinely spray crops. We also note agriculture was not addressed and will be in the final study. We feel the Air Force must at least comment on these

1019 subjects in their study.

Your support is appreciated.

Sincerely,

DEPARTMENT OF AERONAUTICS

John R. Auer
Director

Enclosure

DEPARTMENT OF AERONAUTICS
MAIN OFFICE
Lincoln Municipal Airport
P.O. Box 82088
Lincoln, Nebraska 68501
(402) 471-2371

SAC DETACHMENT
Offutt Air Force Base
Bellevue, Nebraska 68113
(402) 294-3275

AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

40

RECEIVED
OCT 12 1983
Department of Agriculture

MEMO

TO: Rob Raun

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska review

In October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive a copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 14, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three affected counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 14, 1983

1 We have reviewed the Draft Environmental Impact Statement.

___ No comment.

___ Comments are attached.

RECEIVED
NOV 03 1983
POLICY RESEARCH

Name _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

41

MEMO

TO: Charles Benson

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

RECEIVED
SEP 27 1983
POLICY RESEARCH

RECEIVED
SEP 22
DEPT. OF CORR. SERVICES

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me.

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

XX No comment.

___ Comments are attached.

Contact person Dan Ingentrog Title Planning Administrator

Office Dept. Correctional Services

Address P.O. Box 94661, Lincoln, NE Date September 27, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

42

Please return by September 30, 1983

RECEIVED
SEP 30 1983
POLICY RESEARCH

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

XX No comment.

___ Comments are attached.

Contact person Dr. Dean Bergman for Title Commissioner Joe E. Butterworth

Office Department of Education

Address 301 Centennial Mall South Date September 29, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

43

November 21, 1983

Ms. Gayle Malmquist
Policy Research Office
Room 1321 - State Capitol
P.O. Box 94601
Lincoln, NE 68509-4601

RECEIVED
NOV 23 1983
POLICY RESEARCH

RE: Draft EIS - Peacekeeper in Minuteman Silos

Dear Ms. Malmquist:

835 The Department staff has reviewed the sections in the Draft EIS for the project which are pertinent to our programs. We have no comments at this time, other than a reminder to the project sponsor that all activities during the construction phase of the project which involve waste disposal, hazardous material transport, handling, storage and construction activities on or near streams, must first pass through this Department for issuance of appropriate licenses, permits or approvals.

The Department does, however, have a specific comment for which we believe some change is necessary. The comment addresses an evaluation made of the Gering wastewater treatment plant in the Wyoming and Nebraska Socioeconomic Impact Study. Specifically, the comment is as follows:

887 Gering: The study has incorrectly stated that the Gering wastewater treatment facility is designed for a daily flow of 3.86 mgd with the current flows being 1.93 mgd. The wastewater treatment facility is instead designed for 1.93 mgd for the design year 2000. The current average flows for January to September, 1983 are approximately 1.35 mgd. Also, the hydraulic per capita design flow is 120 gpcd, in lieu of 189 gpcd as shown in the study. The wastewater treatment facility was designed for a population of 9,700. A higher per capita flow of 120 gpcd was allowed during the facility's planning stage due to the uncertainty of population growth at that time.

888 The Department questions the approximate 248 persons projected growth per year shown in the study. Based on this growth, the study states that the projected population for the year 1992 is 10,711 residents. If this growth is realized, the City of Gering

Ms. Gayle Malmquist
November 21, 1983
Page Two

888 may need additional wastewater treatment facilities by the year 1991 even without the project. We feel, however, that an addition of 160 people in 1987 due to the project will not adversely affect the present wastewater treatment facility even if the population projection of 248 is correct.

Thank you for allowing us to review this material. We will look forward to reviewing the final EIS.

Sincerely,

George H. Ludwig
Acting Director

GHL/UGB/th

STATE OF NEBRASKA

44

MEMO

TO: Policy Research Office

FROM: Larry Fitzgibbon, Job Service Manager

DATE: September 26, 1983

RE: Comments on MX Related Review Document

285 I feel that the projected socioeconomic data table A.1-14, page A-15, appears to be low on the number of unemployed workers. The latest figures for July, Scotts Bluff County, was 8.2% (1,735 workers unemployed).

I would also recommend that if there is money available that the Scottsbluff and Sidney Job Service offices be granted 2 temporary positions to handle the projected immigration and inquiries about work associated with the MX field. One position would be for approximately 1 year for an Employment Interviewer at a projected cost of $15,395.76. The other position for 6 months for Office Clerk I at a projected cost of 3,840.82.

STATE OF NEBRASKA

45

November 17, 1983

Gayle Malmquist
State House Station
Policy Research Office
Room 1321, State Capitol
Lincoln, NE 68509

Dear Gayle Malmquist:

I have the following comment on the Draft Enviromental Impact Statement.

238 I attended a meeting in Cheyenne, Wyoming on 11/16/83 with the attached group of people. During this meeting David Marshall, with Job Service of Wyoming, and I, by mutual agreement, presented the attached map. This map shows that the Job Service Offices, outlined on this map, could fulfill the needs as outlined in 3.1.1.6 pages 3-20 to 3-22 of the Draft Environmental Impact Statement.

Sincerely,

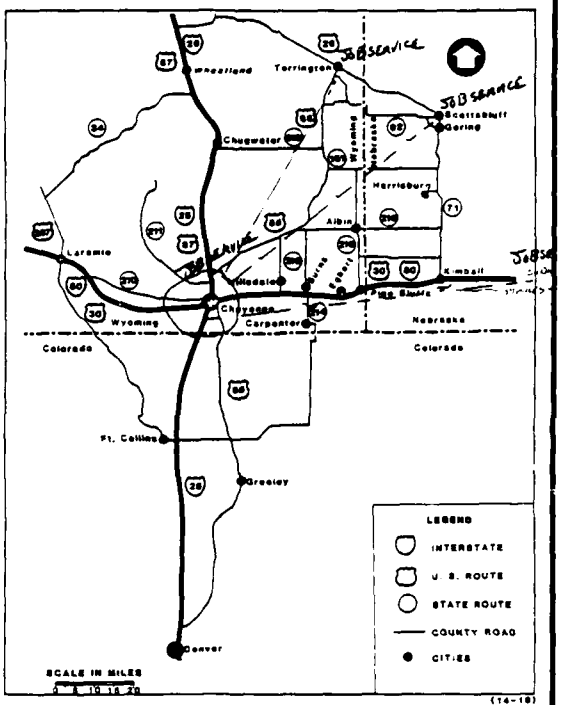
NEBRASKA JOB SERVICE

Larry Fitzgibbon,
Manager

LF/am

cc: David C. Marshall
Col. Warren Hickman,
Warren Air Force Base

NAME	ORGANIZATION	PHONE
Col Norman W Hickman	SAC HQ	375-2911
2 Lt Mac Nabb	Mayors office Cheyenne	633-7762
Brian Pearce	Cheyenne Chamber of Comm	307-635-2209
Mark Huff	The Boeing Co. Seattle WA	206-655-9574
David Marshall	Job Service of WY	777-2811
Ben Costinado Jr.	JTPA - Job Training Program, Nebr.	(308) 632-1275
Harry FitzGibbon	NE JOB SERVICE, SCOTTSBLUFF	308-630-3941
[illegible]	Martin Marietta	(303) 977 2806
Art Allen	FAA	307-634-5853
[illegible]	Wyo Inspector	307-634-3250
Richard Pearson	Steel Mill Workers	(307) 635-9547
[illegible]	[illegible]	[illegible]
Paul [illegible]	US 30 - ALCO/BMI	914-332-6402
[illegible]	[illegible]	[illegible]
Greg Mcneer	"	"
Diane Matt	"	"
Frank Schabs	Rio Algom Mines	307 777-1671
Dave Green	DILCO / PRB	637-6343



REGIONAL HIGHWAYS — FIGURE NO. 10.4.1-1

10-67

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

46

MEMO

TO: [illegible]

FROM: David Marquist

DATE: October 11, 1983

RE: Draft Environmental Impact Statement - MX Missile - Nebraska Review

In October 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 14, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November [illegible], 1983

We have reviewed the Draft Environmental Impact Statement

1 [ ] No comment.

[ ] Comments are attached.

RECEIVED
[illegible], 1983
POLICY RESEARCH

Name [illegible]

Title [illegible]

Office Nebraska [illegible]

Address [illegible] Nebraska [illegible]

Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

47

Please return by September 30, 1983

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 [XX] No comment.

[ ] Comments are attached.

RECEIVED
SEP 27 1983
POLICY RESEARCH

Contact person Wendell O. Olson Title Research and Statistics Chief

Office Nebr. Dept. of Labor, Division of Employment

Address 550 South 16th Street Date September 26, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

48

RECEIVED

OCT 12 1983

DIV. JOB TRAINING

MEMO

TO: Joseph "Sonny" Foster

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman s los located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 ☐ No comment.

☐ Comments are attached.

Name Joseph P. Foster Title Director

Office Divison of Job Training

Address 550 South 16th Street Date October 12, 1983

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

49

MEMO

TO: William J. Edwards

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

RECEIVED
NOV 03 1983
POLICY RESEARCH

1 ☒ No comment.

☐ Comments are attached.

Name William M. Edwards Title Deputy Director

Office Department of Motor Vehicles

Address 301 Centennial Mall S Date November 1, 1983

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

50

RECEIVED
SEP 28 1983
POLICY RESEARCH

MEMO

TO: Holly Jansen

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me. Thank you Gayle

---

Please return by September 30, 1983

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☒ No comment.

☐ Comments are attached.

Contact person William J. Edwards Title Deputy Director

Office Department of Motor Vehicles

Address 301 Centennial Mall South Date 9-27-83

51

Please return by September 30, 1983

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

RECEIVED
OCT 3 1983
POLICY RESEARCH

1 ☒ No comment.

☐ Comments are attached.

Contact person Peter Beeson, PhD. Title Director of Planning

Office Dept. of Public Institutions

Address P.O. Box 94728, Lincoln, NE 68509 Date 9/29/83

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • LOUIS E. LAMBERTY • DIRECTOR STATE ENGINEER

52

RECEIVED
SEP 29 1983
POLICY RESEARCH

September 28, 1983

Ms. Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Lincoln, Nebraska 68509-4601

Dear Ms. Malmquist:

We have reviewed the Peacekeeper in Minuteman Silos Socioeconomic Impact Study and have the following specific comments:

820 1. On page 7-57, paragraph 3, we believe they mean St. Elizabeth's Hospital in Lincoln, not Omaha.

1082 2. Page 7-78, average annual growth rates after paragraph 2, we think they mean Rural State Highways 2.5%, not 25%.

1089 3. Page 7-79, paragraph 4, while we think we know what is meant by the last sentence, it may be misleading to others. The widening of deficient roadways to a 24 foot width of surface and shoulder can be ambiguous. Does it mean 24 feet overall or 24 feet of surfacing and additional shoulder?

1088 4. Page 9-6, paragraph 5 and paragraph 6, we think in paragraph 5 they mean State Highway 71, as it is designated in paragraph 6.

72 While this is a very detailed report, we would make the general observation that the detail is section by section. There is no apparent cohesion. For example, it does not point out that law enforcement and volunteer fire personnel use the existing transportation network. Little mention seems to be made of the source of income and how this affects other aspects of life in the area. We realize this is a draft of a portion of a more inclusive document and perhaps this will be covered adequately in the final Environmental Statement.

We appreciate the opportunity to review the study. If we can provide further assistance, please contact us.

Very truly yours,

Louis E. Lamberty
Director-State Engineer

LEL:GG:f

DEPARTMENT OF ROADS, BOX 94759, LINCOLN, NEBRASKA 68509-4759, PHONE (402) 471-4567

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • LOUIS E. LAMBERTY • DIRECTOR STATE ENGINEER

53

November 22, 1983

Ms. Gayle Malmquist
Policy Research Office
Room 1321, State Capitol
Box 94601
Lincoln, Nebraska 68509-4601

RECEIVED
NOV 23 1983
POLICY RESEARCH

Dear Ms. Malmquist:

992 We have reviewed the Draft Environmental Impact Statement for the siting of MX Missiles in Minuteman Silos in Western Nebraska. We have also just completed a draft of a Needs Study for the Air Force for the access roads in Kimball and Banner Counties. The Air Force and the F.H.W.A. are reviewing this Study at this time. Our comments and recommendations are contained in that Study and are of sufficient length that we will not repeat them here.

We will meet with the F.H.W.A., the Air Force and the State of Wyoming on November 30, 1983, to review our Study and that of Wyoming. We hope to print the final Study shortly thereafter.

Sincerely,

LOUIS E. LAMBERTY
Director-State Engineer

LL:GG:z

DEPARTMENT OF ROADS, BOX 94759, LINCOLN, NEBRASKA 68509-4759, PHONE (402) 471-4567

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

54

OCT 12

MEMO

TO: Gina Dunning

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

RECEIVED
OCT 24 1983
POLICY RESEARCH

We have reviewed the Draft Environmental Impact Statement.

1 ☒ No comment.

☐ Comments are attached.

Name _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • GINA C. DUNNING • DIRECTOR

55

RECEIVED
SEP 30 1983
POLICY RESEARCH

September 29, 1983

TO: Gayle Malmquist, Consultant
Policy Research Office

FROM: Ginger Goomis, Budget Officer
Division of Research and Statistics

RE: Department of Social Services' Response to Wyoming - Nebraska Socioeconomic Impact Study

We have reviewed the appropriate portions of the Wyoming - Nebraska Socioeconomic Impact Study and would like to submit the following comments regarding sections dealing with Kimball, Scotts Bluff, and Banner County social service projections.

Kimball County (7.7.1.1.1.4, 7.7.1.2.2)

826 The source of the current caseload data for Kimball County is not indicated, so it is unclear what the cited figure of 250 cases includes. Based upon current statistics, the figure appears low and does not reflect the full impact of economic conditions on social service programs. Reported data for the April-June 1983 quarter indicate approximately 300 cases, not counting cases receiving staff-provided assistance in such areas as child and adult protective services.

In addition, recent changes in state law specify county responsibility for the maintenance and medical needs of indigent persons who do not qualify for existing state assistance programs. Unemployed persons traveling to missile sites in hope of finding work will be potential users of these county programs. The impact study indicates resources to assist indigent transients are already needed in Kimball County, but it is not clear that these needs have been taken into account in caseload estimates. Given these considerations, the caseload projections in Table 7.7.1-1 should be revised upward.

DEPARTMENT OF PUBLIC WELFARE, BOX 95026, LINCOLN, NEBRASKA 68509-5026, PHONE (402) 471-3121
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

Memorandum to Gayle Malmquist
Page Two
September 29, 1983

Background information about the Nebraska Department of Social Services and the assistance programs offered through local offices contains some misstatements, but these should have no bearing on the accuracy of caseload projections.

Scotts Bluff County (8.14.1.1.10, 8.14.1.2.8)

Again, the base figures used for caseload projections are understated and do not reflect existing conditions. A figure of 3,200 income maintenance cases is stated in the narrative of the study; our current statistics place this figure above 3,500. Tables 8.14.1-6 and 8.14.1-7 appear to use incorrect baseline data resulting in faulty projections.

824 Table 8.14.1-6 estimates the growth in the average caseload per worker over a period of years. The rest of the report indicates that caseload sizes per worker already exceed desirable levels, so any additional workload caused by the missile project may lead to problems in the timely and accurate provision of appropriate services. It should not be assumed that these increases can be picked up without any strain on service delivery.

The impact study does not address the financial impact that increased demand for services will have on County Boards and the State Department of Social Services. In addition to staff considerations, program growth will necessitate an increase in state and local funding sources to finance extra program activity.

Banner County (9.4.1)

825 The provision of social services for residents of both Banner and Kimball Counties is jointly administered through the local office in Kimball, Nebraska. Previous comments about Kimball County apply.

GG:js

1

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

56

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NOV 09 1983
POLICY RESEARCH

OCT 12 1983

MEMO

TO: Department of Social Services
Scottsbluff Area Field Office

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 ☐ No comment.
☐ Comments are attached.

Name _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414

57

We have reviewed the Draft Environmental Impact Statement.

1 ☒ No comment.
☐ Comments are attached.

RECEIVED
OCT 14 1983
POLICY RESEARCH

Name _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

58

Please return by September 30, 1983

Com

RECEIVED
SEP 02 1983
POLICY RESEARCH

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☒ No comment.
☐ Comments are attached.

Contact person _____ Title _____

Office _____

Address _____ Date _____

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • HELEN BOOSALIS • DIRECTOR

59

September 29, 1983

RECEIVED
OCT 10 1983
POLICY RESEARCH

Jayle Malmquist
Policy Research Office
Room 1327
State Capitol Building
Lincoln, NE 68509

RE: "Peacekeeper in Minuteman Silos - Wyoming and Nebraska Socioeconomic Impact Study," Volumes 1-3

Dear Ms. Malmquist

Thank you for the opportunity to review and comment on the above study.

We have reviewed the "Peacekeeper in Minuteman Silos," Wyoming and Nebraska Socioeconomic Impact Study," Volumes 1-3. Our concerns are generally relative to how the project will impact such areas as housing, employment, health care, taxes, crime, safety, etc. and how this project impact in these areas will affect the elderly populations. The studies indicate that generally in Nebraska there will be either no impact or very low levels of impact and that no mitigative measures are suggested or required. Our findings and recommendations are based on these assumptions and could change should any of the conditions or projections change.

Our findings and recommendations are as follows:

FINDING: There appears to be an absence of any planning and analysis regarding the possibility of accidents involving explosions or explosions with release of radioactive materials either on or around the silos or while transporting such materials through the state by rail, air or highway.

176 I understand from office communications with State Civil Defense that when the silos were initially constructed, Nuclear Civil Protection "NCP" plans were developed for the areas in question. I also understand that changing missiles in those silos may not necessitate major revisions of those plans, however, my concerns are in the areas of coordination and safety.

I am sure that some of the Area Administrators have changed since the above mentioned plans were developed. The Civil Defense Director of Scotts Bluff, Sherry Blaha, and the Area Agency on Aging Director, Victor Walker were both hired long after the NCP's were developed.

RECOMMENDATIONS:

I recommend that the possibility of nuclear accident as stated in the above finding be addressed within the overall planning stages.

176 I recommend that extensive coordination take place involving state and area Civil Defense and Area Administrators, including the Area Agency on Aging Director.

I recommend that the above mentioned NCP plans be reconsidered to determine if any revisions are necessary.

Sincerely,

Helen J. Boosalis
Director

HGB:JDM:tf

Enclosures

Copy: Sam Wareham
David Stone
Victor Walker

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • HELEN BOOSALIS • DIRECTOR

60

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NOV 03 1983
POLICY RESEARCH

[illegible]

[illegible]

[illegible]

61

We have reviewed the Draft Environmental Impact Statement.

1 ☒ No comment.

☐ Comments are attached.

RECEIVED
OCT 17 1983
POLICY RESEARCH

Name Nebr Equal Opportunity Comm. Title

Office P.O. Box 4930

Address 4500 Am. I
Scottsbluff NE. 69361

Date 10-14-83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

62

MEMO

TO: Eugene T. Mahoney

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me. Thank you. Gayle

---

Please return by September 30, 1983

RECEIVED
SEP 29 1983
POLICY RESEARCH

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☒ No comment.

☐ Comments are attached.

Contact person Del Whiteley Title Division Chief

Office 2200 No 33rd Box 30370

Address Lincoln NE 68510 Date 9/28/83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

63

MEMO

TO: Herbert Duis

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

RECEIVED
SEP 30 1983
POLICY RESEARCH

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If you have questions, please feel free to contact me. Thank you. Gayle

---

Please return by September 30, 1983

RECEIVED
SEP 30 1983
POLICY RESEARCH

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 ☒ No comment.

☐ Comments are attached.

Contact person Herbert J. Duis Title Chairman

Office Nebr. Liquor Control Commission

Address 301 Centennial Mall, South
Lincoln, Nebraska 68509

Date 9/27/83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

64

MEMO

TO: Herbert Duis

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 ☐ No comment.

☐ Comments are attached.

RECEIVED
OCT 14 1983
POLICY RESEARCH

Name Thomas J. Mick Title Engineer II

Office Liquor Control Commission

Address 301 Centennial Mall South

Date 10/20/83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

65

MEMO

TO: Rudy Peralez

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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OCT 17 1983
POLICY RESEARCH

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1 ☒ No comment.

☐ Comments are attached.

Name [signature] Title Executive Director

Office Mexican American Commission

Address State Office Building Date 14 Oct 83

Lincoln Neb 68509

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • RUDY PERALEZ • DIRECTOR

66

RECEIVED
SEP 30 1983
POLICY RESEARCH

September 28, 1983

Martha Beaman
Policy Research
P.O. Box 9461
Lincoln, NE 68509

Dear Ms. Beaman:

After a brief review of the Wyoming and Nebraska Socioeconomic Impact Study, I offer the following for your consideration. As the report indicates, this issue is controversial, therefore, a careful exploration of all problems that could arise should be made.

828 Although I am by no means an expert in this field, I know that anytime a large number of people come into an area at one time, problems will develop. Changes will need to be made to accomodate the new arrivals.

The chances are that the impact may not be "purely financial" as revenue, but in effect be negative. Many expenditures may have to be made to make the accomodations. There may be an impact for city expenditures, public health and safety, housing and environmental quality during the project.

602 One area of concern is education. An increase of FTE teachers would be required. This would be an added expense to the community. This increase would require additional class room, texts and other instructional material.

1045 Transportation and road maintenance would also change. Perhaps it would not be great, but needs to be taken into consideration.

812 Other areas affected would be public utilities and law enforcement.

I do not believe the negative measures stated fully address the impact that the "Peacekeeper" project will have in the area.

Sincerely,

[signature]

Gloria Reifenrath
Assistant Director

MEXICAN AMERICAN COMMISSION

LINCOLN OFFICE: P.O. Box [illegible] Lincoln, Nebraska [illegible] (402) 471-2795

BRANCH OFFICE: P.O. Box [illegible] [illegible] (308) 632-1314

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

67

(308) 436-7111

North Platte
Natural Resources District

P.O. Box 36 • 1054 Rundell Road • Gering, NE 69341

November 14, 1983

Gayle Malmquist
Policy Research Office
Room 1321, State Capitol
Box 94601
Lincoln, NE 68509-4601

Dear Ms. Malmquist:

The following comment is provided on behalf of the Board of Directors of this district:

1 After reviewing the Draft Environmental Impact Statement by the Air Force in connection with the siting of the MX missile in minuteman silos in western Nebraska and eastern Wyoming we see no immediate concern over the use of water with regard to water quantity or quality, nor do we see any immediate concerns with regard to the use of the land resources in this area.

127 We would, however, like to keep communications open with the Air Force to have the opportunity to express comments during the construction phase if we should have any concerns develop. We also are willing to cooperate with the Air Force in any kind of conservation effort during the construction phase.

Thank you for this opportunity to comment.

Sincerely,

[signature]

Ronald D. Cacek
Manager

RDC/ct

68

We have reviewed the Draft Environmental Impact Statement.

1 ☒ No comment.

☐ Comments are attached.

RECEIVED
NOV 17 1983
POLICY RESEARCH

Name Madon Ferguson Title District Manager

Office South Platte NRD

Address Box 294 Sidney Ne. Date 11-14-83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) [illegible]

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

69

RECEIVED
NOV 02 1983
POLICY RESEARCH

RECEIVED
NATURAL RESOURCES COMMISSION

MEMO

TO: Dayle Williamson

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, plese contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 ☒ No comment.

☐ Comments are attached.

RECEIVED
NOV 02 1983
POLICY RESEARCH

Name [signature] Title Chief, Planning Division

Office Natural Resources Commission

Address 301 Centennial Mall South, P.O. Box 94876 Date October 31, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/ AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA
OIL AND GAS CONSERVATION COMMISSION
BOX 399
SIDNEY, NEBRASKA 69162
(308)254-4565

70

September 26, 1983

RECEIVED
SEP 29 1983
POLICY RESEARCH

Gayle Malmquist
Policy Research Office
Box 94601
Lincoln, NE 68509-4601

Dear Ms. Malmquist:

re: MX impact review

The Commission staff has reviewed the Wyoming-Nebraska Socioeconomic Impact Study completed in connection with siting of the proposed MX Missile program and submits the following comments with respect to impact on oil and gas drilling and producing operations within the affected area.

The Nebraska Counties of Banner and Kimball presently contain over 750 oil and gas wells producing 1.75 million barrels of oil and 0.5 billion cubic feet of natural gas each year. These wells are generally located in the approximate center of 40-acre legal subdivisions. Treatment facilities are located on each lease consisting of a heater-treater vessel and storage tanks. These facilities are sited near the county roads to provide access for transportation to pipeline terminals.

980 Each well site and the treating facilities are connected by pipelines which are buried four to five feet below the surface with the most common type containing a 3 or 4 inch liquid line and a one or two inch gas line in a common lease ditch.

The impact review report did not provide any discussion of impact on the existing production facilities or on that of future facilities which may be the result of continued drilling through the area.

The existing Minuteman sites have caused only a marginal impact and it would not be expected that the MX system would provide any greater impact.

1077 Nearly all of the oil produced in the impacted area is trucked from each lease facility to pipeline terminals located in Banner, Kimball and Cheyenne Counties. The installation of or re-building of existing bridges and roads would result in temporary delays in shipping of oil or result in a slightly longer routing. The movement of drilling and well workover equipment would also be affected during this construction period.

Gayle Malmquist
Page 2
September 26, 1983

1077 New oil and gas facilities are at times delayed due to the necessity of having to cross missile control cables. The Missile Control Officer has requested a six month notice of intention to cross such cables but in actual practice has been very cooperative and has provided assistance to operators in as little as three days. If such cooperation continues there is no concern for this impact or delay.

There have been a few cases where wells could not be drilled in accordance with existing spacing patterns due to the location of missile sites or the control cable right-of-ways. However, the appropriate statutes and the Rules and Regulations of the Commission provide for the drilling of unorthodox locations. Such a location may be necessary to adequately drain an area or to protect the correlative rights of owners but does increase the workload of the Commission and it's staff since such a well must be monitored to insure that the correlative rights of all owners are protected in cases where the well must be drilled closer to a lease line than provided for in the normal spacing pattern. However, the typical workload increase for each such well would only be approximately 0.2 man years over the life of the well.

In summary, the minor delays that could be expected by the oil and gas industry and the Commissions small workload increase due to the installation of the MX System is a small price to pay when compared with the probability that without the protection of our Armed Forces and their facilities we would very likely not have anything to worry about.

Very truly yours,

NEBRASKA OIL AND GAS CONSERVATION COMMISSION

[signature]
Paul H. Roberts
Director

PHR/mlj

STATE OF NEBRASKA
OIL AND GAS CONSERVATION COMMISSION
BOX 399
SIDNEY NEBRASKA 69162
(308)254-4565

71

September 26, 1983

RECEIVED
SEP 29 1983
POLICY RESEARCH

Gayle Malmquist
Policy Research Office
Box 94601
Lincoln, NE 68509-4601

Dear Ms. Malmquist

re: MX impact review

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Gayle Malmquist
Page 2
September 26, 1983

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1077

In summary, the minor delays that could be expected by the oil and gas industry and the Commissions small workload increase due to the installation of the MX System is a small price to pay when compared with the probability that without the protection of our Armed Forces and their facilities we would very likely not have anything to worry about.

Very truly yours,

NEBRASKA OIL AND GAS CONSERVATION COMMISSION

Paul H. Roberts
Director

PHR:

72

Panhandle Resource Council
4802 Avenue I • Scottsbluff, Nebraska 69361 • (308)632-1307

November 17, 1983

RECEIVED
NOV 21 1983
POLICY RESEARCH

Ms. Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, NE 68509-4601

Dear Gayle:

The following comments are a compilation of those major concerns which have been communicated to the Panhandle Resource Council by area officials. As you well know, the local officials are conducting careful, detailed studies of the EIS, and undoubtedly, will or have already submitted lengthy comments expressing their community's concerns. The following comments represent a brief summary of those.

Uppermost is the matter of safety. All officials have indicated a pressing need to be assured by the Air Force that their respective community's safety be given top priority once the project is underway.

The matter of safety has been considered by Kimball-Banner County officials in relation to the rural road systems. Both of these counties are relatively sparsely populated, with residents being accustomed to traveling on such roads with little traffic interference. Though increases in traffic may appear minimal to an outside observer, they cannot be presumed to be of little or no consequence. The additional traffic volume will not only include more traffic, it will also include a flow of military-sized vehicles. As the roads currently stand, meeting on-coming traffic will be difficult with the added numbers and size of vehicles.

988

In conjunction with the aforementioned is that concerning road conditions during inclement weather. While travel is often difficult at any time on gravel roads when experiencing adverse weather, increased numbers on the roads will only couple the danger.

996

Furthermore, Banner County commissioners, who are quite familiar with both short and long term effects of such situations, have indicated that because the present road system was inadequate for Minuteman installation, it will be even more so for Peacekeeper installations.

Kimball County is expected to be designated as a staging area, with immigration figures perhaps nonrepresentative of the true population influx potential. The estimated increases in population did not reflect those

223

Gayle Malmquist
Page 2
November 17, 1983

people coming to the area seeking employment because of the vast media coverage concerning employment possibilities. While projections are difficult to make, just as difficult is the ability to measure the indirect impacts which may well take place. Kimball County officials suggest that these areas of concern should be monitored carefully as time progresses.

223

Another concern is that of the displaced landowners. Though the Air Force has met individually with each of them, there still exists the uncertainty of whether or not they will be justly compensated, and if all options available to them have been explored by the Air Force.

185
192

Conservation and Survey personnel have, through detailed study, indicated that the area which has been categorized as lying in an active fault zone should be given further study. The Peacekeeper in Silo section is lacking in quantification as well as methodology to which attention should be given prior to drawing any conclusions. Additionally, potential ground ruptures could well compromise the safety of the missiles in the silos, with close monitoring of the situation being advised.

1471

Mention has also been made concerning the attention that needs to be given to not only water-level changes, but also to water quality.

1293

I hope that this information will be useful. Should other information be needed, please feel free to contact our office.

Sincerely,

Mary Keller

Mary Keller
Staff Assistant

STATE OF NEBRASKA
ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

73

TO: Major Ronald Torgerson

FROM: Gayle Malmquist

DATE: October 13, 1983

RE: Transmittal of Nebraska Agency Comments on the Wyoming-Nebraska Socioeconomic Impact Study

The Nebraska agency comments on the Wyoming-Nebraska Socioeconomic Impact Study are enclosed. A copy of our distribution list is provided showing who received copies and their response. If nothing is entered after the date ditributed, we have received no response. The comments at the far right, are my notes regarding the contents.

1

Copies of the study were sent to the 77 agencies and individuals listed. Comments were received from 18 departments. Nineteen others responded "no comment". Those statements are all enclosed.

I look forward to receipt of your agenda and reconfirmation of our meeting dates to discuss the WNSIS with department representatives at the State Capitol in Lincoln on November 8, 1983 at 8.A.M. and the three meetings with the local officials in Kimball, Banner and Scottsbluff counties on November 9 and 10, 1983.

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3454
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STATE OF NEBRASKA

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74

Wyoming-Nebraska Socioeconomic Impact Study Comments
Policy Research Office

265 The consultant's baseline population projections vary from the most recent projections doneby the University of Nebraska-Lincoln Bureau of Business Research. The table below shows the different projections in 1985 and 1990 for the three counties. The differences are in both direction and degree. The cohort survival method was used in both projections. Our concern is that if the population forecasts, used as the basis for predicting impacts to the Nebraska counties, are incorrect Scottsbluff and Kimball counties will have a larger baseline population and therefore less capacity to absorb a slightly smaller percentage of project-related immigrants. Conversely, Banner county may have less population than the consultant's forecast to support additional costs which will arise with roadway operation and maintenance.

	Banner		Kimball		Scottsbluff	
	1985	1990	1985	1990	1985	1990
UNL	907	906	4827	4808	40392	42477
URS-BERGER	942	973	4776	4614	39343	39852

376 The use of motel rooms to house weekly commuters does not reflect that the construction season corresponds to the tourist season. Motel room use on a weekly basis by construction workers would reduce the availability of rooms to tourists and hence, decrease income to area businesses and attractions dependent to some extent upon that seasonal income.

1079 Specific information regarding the routing and loads to be carried by the transporter/emplacer vehicle are not specifically addressed, although we understand that the Department of Roads in Nebraska and Wyoming, the roads departments in the impacted counties and the Federal Highway Administration are working with the Military Traffic Management Command to study the various technical aspects of the transportation network necessary to the project.

808 Much of the document relates specifically to the Cheyenne area. While we understand that most of the major population impacts will be directed toward Cheyenne, little space is given to dealing with the impacts a greater perentage of immigration could have upon a smaller population base in the Nebraska counties, specifically in the areas of education, housing, health care and human services. An example also occurs with the Banner County Sherriff Department which consists of one officer. Any additional need for county law enforcement activities in that county will stretch the ability of the one officer.

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STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

75

MEMO

TO: Major Peter Walsh
Director, Environmental Planning Division

FROM: Gayle Malmquist

DATE: November 23, 1983

RE: Transmittal of Nebraska Agency Comments
Draft Environmental Impact Statement

The comments by Nebraska agencies on the Draft Environmental Impact Statement on the Peacekeeper in Minuteman Silos are enclosed. A copy of our distribution list is provided, showing who received copies and their response. The comments at the far right are my notes regarding the contents.

2 Copies of the DEIS were provided to the 144 departments and individuals listed. Comments were received from 18 agencies. Thirty-two others responded "no comment". All statements are enclosed following the order on the distribution list. Those commenting are separated from those who responded "no comment".

Please feel free to contact me if you have any questions about the contents. Thank you for the opportunity to comment and we look forward to the incorporation of those comments into the final document.

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

76

RECEIVED
OCT 12 1983
POLICY RESEARCH

MEMO

TO: Terrence L. Kubicek

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, plese contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

RECEIVED
OCT 12 1983
POLICY RESEARCH

1 We have reviewed the Draft Environmental Impact Statement.
☒ No comment.
☐ Comments are attached.

Name Terrence L Kubicek Title Counties Director
Office Public Power Commission
Address Po Box 94927 Date 10 Oct 1983

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

77

1 We have reviewed the Draft Environmental Impact Statement.
☒ No comment.
☐ Comments are attached.

RECEIVED
NOV 22 1983
POLICY RESEARCH

Name Richard Baringhaus
Office Nebraska State College Board
Address P.O. Box 94605 State Capitol Date 11/18/83

Policy Research Office, Room 1331 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

78

MEMO

TO: [illegible]

FROM: Gayle Malmquist

DATE: October 1, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 1, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 [X] No comment.
[ ] Comments are attached.

RECEIVED
NOV 23 1983
POLICY RESEARCH

Name [illegible] Title [illegible]

Office [illegible]

Address [illegible] Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

79

MEMO

TO: Dr. Henry Smith

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me.

Please return by September 30, 1983

We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

1 [X] No comment.
[ ] Comments are attached.

RECEIVED
1983

Contact person Jack Daniel Title Division Director

Office Health Department

Address 301 Centennial Mall South Date 27 September 83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

80

MEMO

TO: Department of Health
Western Regional Health Department

FROM: Gayle Malmquist

DATE: October 1, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 [X] No comment.
[ ] Comments are attached.

RECEIVED
OCT 19 1983
POLICY RESEARCH

Name [illegible] Title [illegible]

Office [illegible]

Address [illegible] Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

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POLICY RESEARCH

MEMO

TO: [illegible]

FROM: Gayle Malmquist

DATE: October 1, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

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Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

1 [X] No comment.
[ ] Comments are attached.

RECEIVED
OCT 17 1983
POLICY RESEARCH

Name [illegible] Title [illegible]

Office [illegible]

Address [illegible] Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

82

NEBRASKA STATE HISTORICAL SOCIETY

TO _____ DATE _____

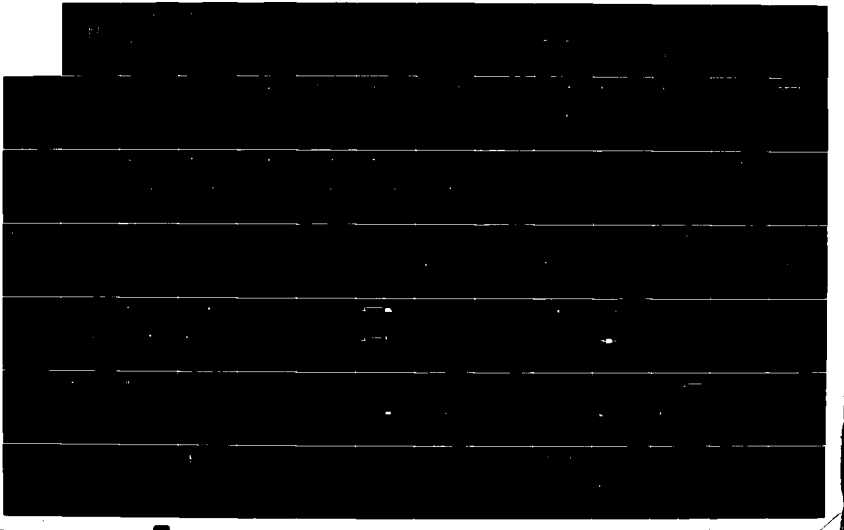
FROM Richard E. Jensen

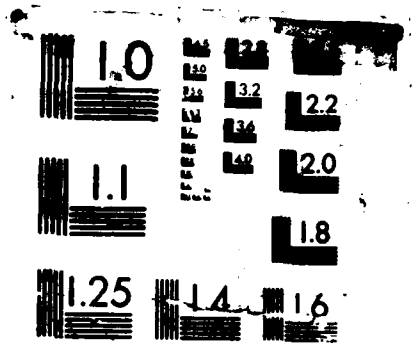
SUBJECT Review of DEIS, Peacekeeper in Wyoming

1258 We have reviewed the [illegible] Peacekeeper [illegible] Resources in Nebraska. The document adequately assesses [illegible] It is our opinion that [illegible] [illegible] [illegible]

AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 2/9

UNCLASSIFIED F/G 16/1 NL





MICROCOPY RESOLUTION TEST CHART

85

811

For all intents and purposes, Major William Palmer will be the contact person because of his being in charge of the Western Division.

After having reviewed the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS), we note that there are no comments made about the state's effort as it pertains to law enforcement. Should it be of interest to the federal people conducting this study, we do offer the following resources out of our Troop E Headquarters in Scottsbluff.

8 traffic law enforcment officers in Scottsbluff proper, and 4 criminal investigators
4 traffic officers in Alliance
1 traffic officer in Bridgeport
3 traffic officers in Chadron, and 2 criminal investigators
2 traffic officers in Chappell
3 traffic officers in Crawford
2 traffic officers in Gordon
3 traffic officers in Kimball
2 traffic officers in Osh Kosh
6 traffic officers in Sidney, and 1 criminal investigator

All officers are assigned vehicles on a 24-hour basis. Troop E offers the services of a bomb disposal expert, a hazardous materials specialist, a 7-man SWAT Team, and a criminal evidence-gathering van.

We just offer this for their information, should they be interested.

J. E. Buist, Lt. Colonel

86

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • COL. E. J. KUMMERFELD • SUPERINTENDENT

October 26, 1983

Major Peter Walsh
AFRCE - BMS DEs
North Air Force Base
San Bernardino, CA. 92409

Major Walsh:

531

We have reviewed your Draft Environmental Impact Statement dated October, 1983. We find nothing addressing state law enforcement.

On September 26, 1983, we advised the Policy Research Office, State of Nebraska that in your Wyoming-Nebraska Socioeconomic Impact Study we noted the lack of any comments pertaining to state law enforcement. Our Assistant Superintendent, Lieutenant Colonel John E. Buist volunteered the resources we could furnish you from our Troop E Headquarters in Scottsbluff, Nebraska.

I am enclosing a copy of his memo for your review. Our only concern is that the Air Force knows what we can offer should you be interested or need our assistance.

Respectfully,

NEBRASAA STATE PATROL

W. F. Palmer, Major
West Division Commander
Box 1265
North Platte, NE. 69101

WFP:dr

cc: Lt. Col. J. E. Buist
File WFP

Enclosures 1

NEBRASKA STATE PATROL, BOX 94907, LINCOLN, NEBRASKA 68509-4907 PHONE (402) 471-4545
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

87

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

MEMO

TO: Robert Keller

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me. Thank you. Gayle

---

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.
☑ No comment.
☐ Comments are attached.

RECEIVED
SEP 30 1983
POLICY RESEARCH

Contact person [illegible] Title [illegible]
Office [illegible]
Address [illegible] Date [illegible]

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

88

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.
☒ No comment.
☐ Comments are attached.

RECEIVED
SEP 29 1983
POLICY RESEARCH

Contact person David Wilke Title Chief Probation Officer
Office State Probation Office
Address Court House Gering Neb Date 9-26-83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

89

OCT 12 1983

MEMO

TO: State Treasurer Kay Orr

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, plese contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

---

1 We have reviewed the Draft Environmental Impact Statement.

[X] No comment.

[ ] Comments are attached.

RECEIVED
OCT 12 1983
POLICY RESEARCH

Name Kay Orr Title State Treasurer

Office Treasurer's

Address Room 2003, Capitol Date October 17, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

90

Please return by September 30, 1983

RECEIVED
7 1983
POLICY RESEARCH

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study

[ ] No comment. The Treasurer's office has insufficient staff available to review material.

[ ] Comments are attached.

Contact person Kay Orr Title State Treasurer

Office Treasurer

Address Room 2003, Capitol Date 9-23-83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

91

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

[X] No comment.

[ ] Comments are attached.

RECEIVED
SEP 23 1983
POLICY RESEARCH

Contact person [illegible] Title [illegible]

Office [illegible]

Address [illegible] Date 9/23/83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

92

1 We have reviewed the Draft Environmental Impact Statement.

[X] No comment.

[ ] Comments are attached.

RECEIVED
OCT 12 1983
POLICY RESEARCH

Name Joe Stauffer Title State Trooper

Office [illegible]

Address [illegible] Date

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

93

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.

Laramie County Branch
2322 Evans Avenue
P.O. Box 1006
Cheyenne, Wyoming 82001
(307) 634-8883

Platte County Branch
103 Park Avenue
P.O. Box 1078
Wheatland, Wyoming 82201
(307) 322-3160

Goshen County Branch
1942 East D
Torrington, Wyoming 82240
(307) 532-4091

Albany County Branch
256 North 30th Street
Laramie, Wyoming 82070
(307) 745-8915

November 14, 1983

Mr. Paul Cleary
State Planning Coordinator's Office
Cheyenne, Wyoming 82002

Dear Mr. Cleary:

Enclosed is the response of Southeast Wyoming Mental Health Center to the Draft Environmental Impact Statement of October, 1983. The response is similar to our response to the Socioeconomic Impact Study, although there are changes which have been made.

Thank you for this opportunity to respond. I will be available to answer any questions.

Sincerely,

Raymond Muhr

Raymond Muhr, Th.D.
Director - Psychologist

RM:vw

Enclosure

cc: Alvin Wiederspahn, President, Board of Directors
Mayor Don Erickson
Cheyenne City Council
Laramie County Commissioners
Ellen Crowley
Division of Community Programs

RESPONSE TO DRAFT

ENVIRONMENTAL IMPACT STATEMENT

October, 1983

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.

November 14, 1983

I. FACTUAL RESPONSE.

The report should be modified as follows:

First, narrative descriptions and data for four substance abuse programs were omitted: a) Project Hope; b) Alcohol Traffic Safety; and, c) New Morning Awareness House; d) Cheyenne Halfway House for Alcoholics.

558

Second, the total number of clients seen by the Mental Health Center in Laramie County in FY 83 was 2,573 and not 1,130 as reported on page 3-290. The 2,573 figure does not include persons served in consultation and education activities, collateral contacts with family members, or contacts with community professionals and agencies about clients.

Third, psychiatric emergencies provided by the Mental Health Center are not addressed.

559 II. ASPECTS OF IMPACT.

555 The report states impact in mental health to be moderate and in substance abuse to be low; however, moderate and low are not defined. It is clear to us that utilization of mental health and substance abuse services is disproportionate in an impact population. Mental health services increased 62% in our Wheatland office during the peak year of impact with the power plant. 65.5% of the caseload during the peak year of 1978-1979 was new residents. Emergencies increased 100%. Our experience shows that an impact population does disproportionately need and use mental health services. We contend that the projected estimates are invalid because they reflect a relatively stable population, not an impact population, especially for mental health and alcohol emergencies. What is of concern is that our programs are at capacity and any increase in services will be a hardship and cannot be absorbed, easily or otherwise.

Cheyenne is located on two interstates and a major highway which brings transients weekly to the Cheyenne area who experience psychiatric and substance abuse crises. The Center plays the central role in treating these individuals in crisis. Law enforcement, local hospitals, the Department of Public Assistance and Social Services, and other community agencies heavily use our emergency service. The influx of transients presenting psychiatric and alcohol emergencies during the impact period is a given as well as an increased number of such emergencies within the impact population.

Psychiatric Emergencies.

Psychiatric emergencies are unduly time consuming. Individuals have to be evaluated, often hospitalized, and treated intensively until disposition, quite unlike giving out-patient psychotherapy once a week. This often takes several hours at one time. Emergencies are disruptive to staff schedules and an emergency system must be in a place to manage an extensive number of emergencies. The emergency system in Laramie County is at capacity. It is expected there will be an increase in family violence, including child and spouse abuse. The Center receives the bulk of the referrals from the Child Protection Team. The Center by statute is required to evaluate patients considered potentially dangerous to self or others. Other mental health emergencies are presented by law enforcement and social services, the emergency rooms of the hospitals and other agencies. A proposed psychiatric hospital will likely have little impact on our emergency service, especially out-patient emergencies.

Substance Abuse Problems and Emergencies.

All of the substance abuse programs in Laramie County are at capacity. A disproportionate use of these programs can be expected during the impact period. The problem of alcoholism at a national level is alarming. A new Gallup Poll on "Alcohol Abuse in America" states that 81% of adults perceive alcohol abuse as a major national problem and 33% report that drinking has been a cause of trouble in their family. Our one experience with alcohol abuse during an impact period was with the building of the power plant in Wheatland, Wyoming, where reported alcohol problems among the impact population was double that of the resident population. Alcohol services increased 44%. One of the worst problems we encountered in Wheatland was among individuals who came seeking employment but did not find it.

One major impact will be on the Alcohol Receiving Center. Currently about 4 persons a month are turned away when bed capacity is full. An increase in public intoxication means more public inebriates will be jailed, hospitalized, or go without service. Jail is not a viable option and does not provide opportunity for adequate screening and appropriate medical care. Hospitalization is expensive and if utilized raises the question as to who will pay for this service. A large percentage of this population do not carry health insurance, especially transients. The cost of doing nothing is the potential threat to public safety and a danger of severe illness and death for the inebriate.

III. RECOMMENDATIONS.

1. The Concept of Monitoring.

553 Monitoring for increased demand for services as a mitigation measure is reasonable except in psychiatric or substance abuse emergencies. Emergency care is dependent upon a system being in place before the fact and not during emergency. Suicide prevention and intervention, evaluation of a patient potentially dangerous to others, medication and hospitalization of a

psychotic patient are emergencies, day or night, which require immediate attention. Detoxification of a public inebriate requires immediate screening for appropriate medical care and referral. A system at capacity cannot be responsive to increased demands of an emergency nature.

More traditional forms of therapy are subject to monitoring. Individuals and families may utilize private resources or may not opt for treatment. However, emergencies, by their very nature will not go untended. Private resources are not equipped or designed for emergency care. The burden will fall upon the Mental Health Center. Individuals who the Center do not treat will require
553 action. It is a question of whether that action takes place in a mental health center, the jail, or a hospital.

Part of the monitoring process should include source of payment. If increased demand for services is made by those who can afford to pay or have third party coverage, there would be no concern regarding funding for increased services. However, this is not expected for a good share of emergency care, either mental health or substance abuse.

2. Mental Health Emergencies.

a) A full-time staff member should be added to the Center during the peak years of 1985-1988 to handle emergencies among the impact population and expected increase in transients presenting psychiatric emergencies. This staff person will be needed during the bust cycle of the impact period, as psychiatric emergencies increase disproportionately during unemployment. It is easy to underplay the burden of emergency care. However, during the day it is disruptive to schedules and unfair to on-going patients at night it is neces-
560 sary for staff to be available for face-to-face contact. One cannot treat emergencies in the middle of the night and be expected to function, on any continual basis, the next day.

b) Medical coverage for emergency care is the most expensive singular portion of the Center budget as is psychiatric care itself. The state of Wyoming does not fund emergency care. No entity specifically funds psychiatric care or the back-up medical coverage necessary. No emergency system can function without appropriate medical coverage. It is recommended that a fund be earmarked during the four-year period of 1985-1988 which would pay for services for psychiatric/medical coverage beyond what the Center now provides. These funds would not benefit the Mental Health Center directly, but would assure medical coverage beyond current program capacity. Funds which were not utilized would be returned

3. Substance Abuse Problems and Emergencies.

a) It is recommended that one alcohol intervention specialist be added to the alcohol programs to ease the burden of increased caseload during the peak four-year period of 1985-1988 and following whatever period is defined as the bust cycle of the impact. One full-time staff will aid in providing prevention, early intervention, and treatment of the increased caseload in substance abuse. It is not suggested that staff be added to the Alcohol Receiving Center or Halfway House as the facilities could not integrate increased staff, although these programs are at capacity and will experience increased demands for service. An additional FTE would be assigned to Project Hope, Alcohol Traffic Safety, and New Morning Awareness House to aid these three programs now at capacity. One mitigation measure is the establishment of educational programs to deal with the full range of alcohol abuse problems, and we are suggesting this would be a role for a staff for an alcohol specialist assigned to our substance abuse programs.

b) It should be noted that our alcohol programs as constituted are not eligible for third party payment and many individuals
561 who use alcohol services do not have health insurance, especially transients. A high percentage of admissions to the Alcohol Receiving Center are transients. The impact population will increase admissions as well. The Center is not anticipating increased state support in either mental health or substance abuse, and, in fact, has taken a 4% reduction in state funding this fiscal year overall.

It is expected that the demand for detoxification of the public inebriate will increase markedly. As the Alcohol Receiving Center is frequently at capacity and the facility cannot increase admissions, it is recommended that funds for hospitalization for medical emergencies for detoxification be established. These funds would not directly go to the Alcohol Receiving Center, but would pay for detoxification in hospital beneifts beyond program capacity. The public inebriate does not belong in jail. Left alone the individual is a danger to public safety and self. Hospitalization will be necessary for persons not admitted to the Alcohol Receiving Center. Any unexpended funds would be returned.

IV. SUMMARY.

The Draft Environmental Impact Statement suggests impact in mental health will be moderate and impact for the alcohol receiving center will be low; however, moderate and low are not defined. The substance abuse programs of Southeast Wyoming Mental Health Center in Laramie County are not includec in the report. It is our belief and experience that substance abuse will have a high impact, especially on detoxification. Psychiatric emergencies

will also have have a high impact. Additional staff will be needed to deal with psychiatric emergencies and substance abuse problems,as well as funds for necessary medical coverage and hospital care for psychiatric emergency and detoxification.

The report suggests a monitoring program for evaluation of impact on each agency, which we believe is a good suggestion. However, the provision of psychiatric emergency and detoxification services cannot await monitoring. Mitigation for these services needs to be in place at the beginning of impact. The report also suggests that agency needs for facilities be met where impact will result in additional local needs that exceed current capactiy. We have suggested financial support for medical coverage and hospitalization for the Alcohol Receiving Center. Another option would be utilization of these funds for an adequate facilty, which would negate the need for extra funds for hospitalization.

Nor is the unique position of the location of Cheyenne given enough consideration in terms of attracting a transient population that by definition will require psychiatric and substance abuse treatment. It is our contention from our experience in Wheatland, Wyoming and from our general understanding of impact, that there will be a disproportionate use of mental health and substance abuse services as a result of impact.

It is expected that the level of impact in the other three southeast counties, Albany, Goshen and Platte, is not such a nature that the Mental Health Center and substance abuse programs cannot absorb services required during the impact period.

Thank you for this opportunity to respond to the Draft Environmental Impact Statement.

Raymond Muhr

Raymond Muhr, Th.D.
Director
Southeast Wyoming Mental Health Center, Inc.

RM:vw

SUBSTANCE ABUSE PROJECTS OF
SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.

I. Cheyenne Halfway House

Baseline Description

The Cheyenne Halfway House is a residential treatment program for persons with alcohol problems. Individual, group, and family counseling complement a milieu therapy program. Services are offered to all four southeast counties, but mainly in Laramie County.

Staff consist of a full-time Director and Assistant Director, a half-time counselor, a secretary and a cook-resident manager. The half-time counselor was added in 1981.

The total FY 1983 budget was $110,669.

The Halfway House has a capacity of 11 residents. It is at capacity at all times with a current waiting list. The Halfway House had 119 admissions in fiscal year 1983. The average age was 34½ years and the average length of stay 24 to 26 days.

Another 125 people are seen by the staff for individual outpatient counseling and 130 people participate in out-patient groups, for a total of 255 persons in the out-patient program.

II. Alcohol Receiving Center

Baseline Description

The Alcohol Receiving Center is a 4-bed, 3-day, 24-hour care, non-medical detoxification facility. The public inebriate receives detoxification from alcohol, counseling, screening for medical detoxification and referral and follow-up care. Services are available for all four southeast counties, but Laramie County is the major user. A structured Antabuse program utilizes the opportunity to drop in and discuss the patient's progress with sobriety with their counselor as part of the follow-up program.

Staff consist of seven full-time counselors on three shifts, 365 days a year. The Center is never closed! The Director, Assistant Director, secretary and cook of the Cheyenne Halfway House also serve in these capacities for the Receiving Center, but are separate from the seven full-time staff.

The total FY 1983 budget was $111,000.

The Receiving Center has a capacity of four with two roll-away beds to expand capacity to six if needed. The Receiving Center is frequently filled to capacity from 10:00 p.m. to 3:00 a.m. and approximately four people a month are turned away. There were 521 admissions in fiscal year 1983. The average age was 38 and the average length of stay was 2 days. Approximately 36% were transients.

185 people received Antabuse through the structured Antabuse Program. The drop-in function is used by an average of 30 people every day of the year.

III. Alcohol Traffic Safety Program (DWI)

Baseline Description

The Alcohol Traffic Safety Program is a prevention-education and referral program for the individual convicted of driving while under the influence. An individual is evaluated on referral for treatment to a substance abuse program and/or placed in a four-week educational program. The educational program consists of lectures, films, class participation, home assignments, self-evaluations and tests, all in the format of a behavior modification approach.

Staff consist of one full-time staff member and a secretary who is shared with another substance abuse program, Project Hope.

The total FY 83 budget was $27,888.

Three hundred and fifty-four people were evaluated and 221 completed the four-week educational program in FY 83. The average age was 33. The capacity of this program is the size of the educational groups. A group of more than 15 people is cumbersome, necessitating the addition of another group. There were numerous times during the year when more than one group was being run simultaneously.

The Director of this program also serves as the liaison with the local courts for all of the substance abuse programs spending up to ten hours per week in city and county court.

IV. Project Hope

Baseline Description

Project Hope is an out-patient counseling program for youth, the alcoholic and the family of the alcoholic. It is a drop-in facility where individual's may come for conversation, individual, family or group counseling. One may stay for a few minutes or a few hours, depending upon their need at the time.

Staff consist of a Director, a full-time counselor, and a secretary who is shared with the Alcohol Traffic Safety Program. There is currently a half-time volunteer counselor whose salary is paid by Green Thumb (a program for senior citizens) who functions as an aide or assistant. There have been no changes in counselor staffing (other than the ½ time volunteer counselor) since 1980.

The total FY 83 budget was $62,430.

A total of 262 new patients and 150 continuing patients, for a total of 412 patients were seen by Project Hope in fiscal year 1983. The average age of patients was 25 years, due to a relatively large number of adolescents using the services of Project Hope. The patient caseload is at capacity given the current staffing. There is no formal waiting list at present, but often people must wait a week or two for their first scheduled appointment and then can only be seen every other week due to scheduling problems. There is no time for any prevention activities which this project has expertise to provide. There are frequent evening and weekend emergencies which staff handle.

V. New Morning Awareness House (Awareness House)

Baseline Description

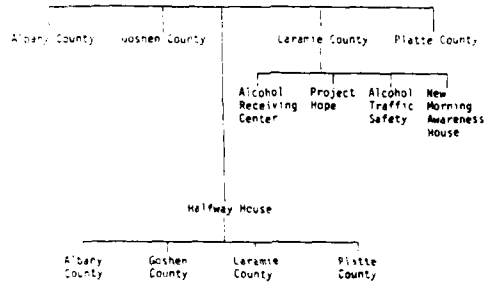
Awareness House focuses upon prevention and early intervention of substance abuse problems. This program provides information, education and alternatives to youths and their families. The Awareness House is open to all youth and their parents and is designed to offer a comfortable, informal setting where young people by themselves, or with their parents, may discover positive, non-chemical alternatives to substance abuse. Consultation and education is provided to the schools and many organizations in the local community. Local clubs, social groups and local radio stations and newspapers are provided with information on substance abuse education and prevention strategies.

Awareness House is comprised of 2½ staff. There is no secretary and secretarial duties are shared by all staff. There have been no staff changes at Awareness House for many years.

The total FY 83 budget was $53,780.

A partial listing of Awareness House activities for July 1, 1982 to June 30, 1983 includes 146 school presentations, 38 community awareness sessions, and 1,140 hours devoted to alternative activities. The project, because of lack of adequate staff, is severely limited in the amount of time that can be spent on any particular activity.

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.*



*Modified Organizational Chart 10/12/83

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC

Laramie County Branch
2323 E Evans Avenue
P.O. Box 1005
Cheyenne, Wyoming 82003
(307) 634 9853

Platte County Branch
103 Park Avenue
P.O. Box 1078
Wheatland, Wyoming 82201
(307) 322 3190

Goshen County Branch
1947 [illegible]
[illegible]
[illegible]

Albany County Branch
[illegible]
[illegible]
[illegible]

94

October 13, 1983

Mr. Paul Cleary
State Planning Coordinator's Office
Cheyenne, Wyoming 82002

Dear Mr. Cleary:

Enclosed are the responses of Southeast Wyoming Mental Health Center to the Wyoming and Nebraska Socioeconomic Impact Study of September, 1983. The responses primarily deal with mental health and substance abuse services in Laramie County.

Thank you for the opportunity to respond. I would be happy to answer any questions.

Sincerely,

Raymond Muhr

Raymond Muhr, Ph.D.
Director - Psychologist

RM:vw

Enclosure

cc: Alvin Niederspahn, President, Board of Directors
Mayor Don Erickson
Cheyenne City Council
Laramie County Commissioners
Ellen Crowley
Division of Community Programs

RESPONSE TO WYOMING AND NEBRASKA

SOCIOECONOMIC IMPACT STUDY

September, 1983

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.

October [illegible], 1983

I. FACTUAL RESPONSE.

The report contains errors and omissions about programs and services in mental health and substance abuse provided by the Center. A modified organizational chart and revised baseline description are included for clarification. The major errors and omissions are:

758 First, narrative descriptions and data for three substance abuse programs were omitted: a) Project Hope; b) Alcohol Traffic Safety; and, c) New Morning Awareness House.

720 Second, the Alcohol Receiving Center and the Cheyenne Halfway House for alcoholics are inappropriately and incorrectly combined in Tables 3.10.1-6 and 3.10.1-7. The report shows both programs with a combined staff of 4.5. The Halfway House has 4.5 staff. The Alcohol Receiving Center has 7 staff, with 2 counselors on duty each 8-hour shift.

740 Third, the total number of clients seen by the Mental Health Center in Laramie County in FY 83 was 2,573 and not 1,130 as reported on page 3-290. The 2,573 figure does not include persons served in consultation and education activities, collateral contacts with family members, or contacts with community professionals and agencies about clients.

708 Fourth, staff listing is incorrect for Laramie County. The Center has a full-time psychiatrist and uses part-time physicians for emergency coverage. The remainder of the staff include 6 psychologists, 3 social workers, 6 master's level counselors and 1 counselor at the bachelor's level. Laramie County does not have 10 clerical support staff, as 7 staff serve the 4 county region and 3 serve Laramie County.

II. ASPECTS OF IMPACT.

The report states impact in mental health and substance abuse to be moderate; however, moderate is not defined. Predictions of increased caseload are based solely on population increase and do not account for the disproportionate use of services by an impact population, especially emergency and alcohol services. The state of the art in predicting impact in human services is at best uncertain, but it is clear to us that utilization of mental health and substance abuse services is disproportionate in an impact population. Mental health services increased 62% in our Wheatland office during the peak year of impact with the power plant. 65.5% of the caseload during the peak year of 1978-1979 was new residents. Emergencies increased 100%. Our experience shows that an impact population does disproportionately need and use mental health services. We contend that the projected estimates are invalid because they reflect a relatively stable population, not an impact population, especially for mental health and alcohol emergencies. What is of concern is that our programs are at capacity and any increase in services will be a hardship and cannot be absorbed, easily or otherwise.

Cheyenne is located on two interstates and a major highway which [illegible] transients weekly. To the Cheyenne area who experience psychiatric and [illegible]

- 2 -

stance abuse crises. The Center plays the central role in treating these individuals in crisis. Law enforcement, local hospitals, the Department of Public Assistance and Social Services, and other community agencies heavily use our emergency service. The influx of transients presenting psychiatric and alcohol emergencies during the impact period is a given as well as an increased number of such emergencies within the impact population.

Psychiatric Emergencies.

Psychiatric emergencies are unduly time consuming. Individuals have to be evaluated, often hospitalized, and treated intensively until disposition, quite unlike giving out-patient psychotherapy once a week. This often takes several hours at one time. Emergencies are disruptive to staff schedules and an emergency system must be in a place to manage an extensive number of emergencies. The emergency system in Laramie County is at capacity. It is expected there will be an increase in family violence, including child and spouse abuse. The Center receives the bulk of the referrals from the Child Protection Team. The Center by statute is required to evaluate patients considered potentially dangerous to self or others. Other mental health emergencies are presented by law enforcement and social services, the emergency rooms of the hospitals and other agencies.

Substance Abuse Problems and Emergencies.

All of the substance abuse programs in Laramie County are at capacity. A disproportionate use of these programs can be expected during the impact period. The problem of alcoholism at a national level is alarming. A new Gallup Poll on "Alcohol Abuse in America" states that 81% of adults perceive alcohol abuse as a major national problem and 33% report that drinking has been a cause of trouble in their family. Our one experience with alcohol abuse during an impact period was with the building of the power plant in Wheatland, Wyoming, where reported alcohol problems among the impact population was double that of the resident population. Alcohol services increased 44%. One of the worst problems we encountered in Wheatland was among individuals who came seeking employment but did not find it.

One major impact will be on the Alcohol Receiving Center. Currently about 4 persons a month are turned away when bed capacity is full. An increase in public intoxication means more public inebriates will be jailed, hospitalized, or go without service. Jail is not a viable option and does not provide opportunity for adequate screening and appropriate medical care. Hospitalization is expensive and if utilized raises the question as to who will pay for this service. A large percentage of this population do not carry health insurance, especially transients. What is the cost of doing nothing? There is a potential threat to public safety and a danger of severe illness and death for the inebriate.

- 3 -

III. RECOMMENDATIONS.

1. The Concept of Monitoring.

Monitoring for increased demand for services is reasonable except in psychiatric or substance abuse emergencies. Emergency care is dependent upon a system being in place before the fact and not during emergency. Suicide prevention and intervention, evaluation of a patient potentially dangerous to others, medication and hospitalization of a psychotic patient are emergencies, day or night, which require immediate attention. Detoxification of a public inebriate requires immediate screening for appropriate medical care and referral. A system at capacity cannot be responsive to increased demands of an emergency nature.

749 More traditional forms of therapy are subject to monitoring. Individuals and families may utilize private resources or may not opt for treatment. However, emergencies, by their very nature cannot go untreated. Private resources are not equipped or designed for emergency care. The burden will fall upon the Mental Health Center. Individuals who the Center do not treat will require action. It is a question of whether that action takes place in a mental health center, the jail, or a hospital.

Part of the monitoring process should include source of payment. If increased demand for services is made by those who can afford to pay or have third party coverage, there would be no concern regarding funding for increased services for non-emergency types of therapy.

2. Mental Health Emergencies.

713 a. A full-time staff member should be added to the Center during the peak years of 1985-1988 to handle emergencies among the impact population and expected increase in transients presenting psychiatric emergencies. It is easy to underplay the burden of emergency care. However, during the day it is disruptive to schedules and unfair to on-going patients and at night it is necessary for staff to be available for face-to-face contact. One cannot treat emergencies in the middle of the night and be expected to function the next day.

b. Medical coverage for emergency care is the most expensive singular portion of the Center budget as is psychiatric care itself. The state of Wyoming does not fund emergency care. No entity specifically funds psychiatric care or back-up medical coverage. No emergency system can function without medical coverage. It is recommended that a fund be earmarked during the four-year period of 1985-1988 which would pay for services for psychiatric/medical coverage for emergency care beyond what the Center now provides. These funds would not

713 benefit the Center directly, but would assure emergency psychiatric coverage beyond current program capacity. Funds which were not utilized would be returned.

Substance Abuse Problems and Emergencies.

a) It is recommended that one alcohol intervention specialist be added to the alcohol programs to ease the burden of increased caseload during the peak four-year period of 1985-1988. One full-time staff will aid in providing prevention, early intervention, and treatment of the increased caseload in substance abuse. It is not suggested that staff be added to the Alcohol Receiving Center or Halfway House, as the facilities could not integrate increased staff, although these programs are at capacity and will experience increased demands for service. An additional FTE would be assigned to our counseling and prevention programs which are all now at capacity.

b) It should be noted that our alcohol programs as constituted are not eligible for third party payment and many individuals
715 who use alcohol services do not have health insurance, especially transients. A high percentage of admissions to the Alcohol Receiving Center are transients. The impact population will increase admissions as well. The Center is not anticipating increased state support in either mental health or substance abuse, and, in fact, has taken a 4% reduction in state funding this fiscal year overall.

It is expected that the demand for detoxification of the public inebriate will increase markedly. As the Alcohol Receiving Center is frequently at capacity and the facility cannot increase admissions, it is recommended that funds for hospitalization for medical emergencies for detoxification be established. These funds would not directly go to the Alcohol Receiving Center, but would pay for detoxification in hospital beneifts beyond program capacity. The public inebriate does not belong in jail. Left alone the individual is a danger to public safety and self. Hospitalization will be necessary for persons not admitted to the Alcohol Receiving Center. Any unexpended funds would be returned.

IV. SUMMARY.

From the beginning we have emphasized concerns about increased demands in mental health emergencies and substance abuse detoxification. The Socioeconomic Impact Study does not adequately address these areas. Nor does it appear to understand the nature of emergency care and the role of the Mental Health Center in providing such care in Laramie County. The study underplays the stress level experienced by an impact population and

the community. Nor is the unique position of the location of Cheyenne given enough consideration in terms of attracting a transient population that by definition will require psychiatric and substance abuse treatment. It is our contention from our experience in Wheatland, Wyoming and from our general understanding of impact, that there will be a disproportionate use of mental health and substance abuse services as a result of impact.

It is expected that the level of impact in the other three southeast counties, Albany, Goshen and Platte, is not such a nature that the Mental Health Center and substance abuse programs cannot absorb services required during the impact period.

Thank you for this opportunity to respond to the Socioeconomic Impact Study.

Raymond Muhr

Raymond Muhr, Th.D.
Director
Southeast Wyoming Mental Health Center, Inc.

SUBSTANCE ABUSE PROJECTS OF
SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.

I. Cheyenne Halfway House

Baseline Description

The Cheyenne Halfway House is a residential treatment program for persons with alcohol problems. Individual, group, and family counseling complement a milieu therapy program. Services are offered to all four southeast counties, but mainly in Laramie County.

Staff consist of a full-time Director and Assistant Director, a half-time counselor, a secretary and a cook-resident manager. The half-time counselor was added in 1981.

The total FY 1983 budget was $110,669

The Halfway House has a capacity of 11 residents. It is at capacity at all times with a current waiting list. The Halfway House had 119 admissions in fiscal year 1983. The average age was 34½ years and the average length of stay 24 to 26 days.

Another 125 people are seen by the staff for individual outpatient counseling and 130 people participate in out-patient groups, for a total of 255 persons in the out-patient program.

II. Alcohol Receiving Center

Baseline Description

The Alcohol Receiving Center is a 4-bed, 3-day, 24-hour care, non-medical detoxification facility. The public inebriate receives detoxification from alcohol, counseling, screening for medical detoxification and referral and follow-up care. Services are available for all four southeast counties, but Laramie County is the major user. A structured Antabuse program utilizes the opportunity to drop in and discuss the patient's progress with sobriety with their counselor as part of the follow-up program.

Staff consist of seven full-time counselors on three shifts, 365 days a year. The Center is never closed! The Director, Assistant Director, secretary and cook of the Cheyenne Halfway House also serve in these capacities for the Receiving Center, but are separate from the seven full-time staff.

The total FY 1983 budget was $111,000.

The Receiving Center has a capacity of four with two roll-away beds to expand capacity to six if needed. The Receiving Center is frequently filled to capacity from 10:00 p.m. to 3:00 a.m. and approximately four people a month are turned away. There were 521 admissions in fiscal year 1983. The average age was 38 and the average length of stay was 2 days. Approximately 36% were transients.

185 people received Antabuse through the structured Antabuse Program. The drop-in function is used by an average of 30 people every day of the year.

III. Alcohol Traffic Safety Program (DWI)

Baseline Description

The Alcohol Traffic Safety Program is a prevention-education and referral program for the individual convicted of driving while under the influence. An individual is evaluated on referral for treatment to a substance abuse program and/or placed in a four-week educational program. The educational program consists of lectures, films, class participation, home assignments, self-evaluations and tests, all in the format of a behavior modification approach.

Staff consist of one full-time staff member and a secretary who is shared with another substance abuse program, Project Hope.

The total FY 83 budget was $27,888.

Three hundred and fifty-four people were evaluated and 221 completed the four-week educational program in FY 83. The average age was 33. The capacity of this program is the size of the educational groups. A group of more than 15 people is cumbersome, necessitating the addition of another group. There were numerous times during the year when more than one group was being run simultaneously.

The Director of this program also serves as the liaison with the local courts for all of the substance abuse programs spending up to ten hours per week in city and county court.

IV. Project Hope

Baseline Description

Project Hope is an out-patient counseling program for youth, the alcoholic and the family of the alcoholic. It is a drop-in facility where individuals may come for conversation, individual, family or group counseling. One may stay for a few minutes or a few hours, depending upon their need at the time.

Staff consist of a Director, a full-time counselor, and a secretary who is shared with the Alcohol Traffic Safety Program. There is currently a half-time volunteer counselor whose salary is paid by Green Thumb (a program for senior citizens) who functions as an aide or assistant. There have been no changes in counselor staffing (other than the ½ time volunteer counselor) since 1980.

The total FY 83 budget was $62,430.

A total of 262 new patients and 150 continuing patients, for a total of 412 patients were seen by Project Hope in fiscal year 1983. The average age of patients was 25 years, due to a relatively large number of adolescents using the services of Project Hope. The patient caseload is at capacity given the current staffing. There is no formal waiting list at present, but often people must wait a week or two for their first scheduled appointment and then can only be seen every other week due to scheduling problems. There is no time for any prevention activities which this project has expertise to provide. There are frequent evening and weekend emergencies which staff handle.

V. New Morning Awareness House (Awareness House)

Baseline Description

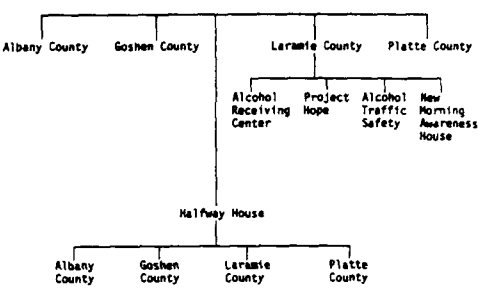
Awareness House focuses upon prevention and early intervention of substance abuse problems. This program provides information, education and alternatives to youths and their families. The Awareness House is open to all youth and their parents and is designed to offer a comfortable, informal setting where young people by themselves, or with their parents, may discover positive, non-chemical alternatives to substance abuse. Consultation and education is provided to the schools and many organizations in the local community. Local clubs, social groups and local radio stations and newspapers are provided with information on substance abuse education and prevention strategies.

Awareness House is comprised of 2½ staff. There is no secretary and secretarial duties are shared by all staff. There have been no staff changes at Awareness House for many years.

The total FY 83 budget was $53,780.

A partial listing of Awareness House activities for July 1, 1982 to June 30, 1983 includes 146 school presentations, 36 community awareness sessions, and 1,140 hours devoted to alternative activities. The project, because of lack of adequate staff, is severely limited in the amount of time that can be spent on any particular activity.

SOUTHEAST WYOMING MENTAL HEALTH CENTER, INC.*



*Modified Organizational Chart 10/12/83

95

University of Nebraska Lincoln
College of Architecture

Department of Community and Regional Planning
208 Former Law Building
Lincoln, NE 68588-0108
(402) 472-3582

RECEIVED
NOV 18 1983
POLICY RESEARCH

November 16, 1983

Gayle Malmquist
Policy Research Office
Room 1321
State Capitol
Box 94601
Lincoln, NE 68509-4601

Dear Gayle:

I have reviewed the Draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos, dated October 1983. I would like to make the following comments which represent my opinions not those of the State, University, College or Department for which I work:

76 1) The statutory limitation on the scope of this consideration to implementation segments the consideration of important questions of policy and technology and in some ways appears to make the statement out of character with CEQ guidelines, especially 1502.2 (e) "The range of alternatives discussed ...shall encompass those to be considered by the ultimate agency decision-maker," and 1502.14 on alternatives. I recognise the effect of the statute, but still feel that the impact assessment is prematurely narrowed in content.

462 2) The discussion of Social Well-Being appears somewhat limited in terms of potential stress effects of the proposed action not only in terms of human services demands which are noted, but in psychological terms and in conflicts between newer and older residents.

426 3) Economic effects will likely be more negative as poor, older and minority citizens are impacted, particularly as prices increase, and may raise questions of equity.

138 4) Rural land use disruption from "corridors" may be more significant than noted depending on how many farms are involved and the specific types of activity disrupted.

158 5) Demand for recreation may cause conflicts between agricultural owners and others related to trespass, loss of wildlife, and other problems of access to private land.

1402 6) Impacts on biological resources, geologic conditions,
1456 especially faults and on existing water rights could be
200 significant (as discussed in the EIS) and are worthy of more detailed analysis.

Sincerely,

Charles F. Dekmatel
Associate Professor

University of Nebraska-Lincoln University of Nebraska at Omaha University of Nebraska Medical Center

96

University of Nebraska Lincoln
Institute of Agriculture and Natural Resources

Conservation and Survey Division
113 Nebraska Hall
901 North 17th Street
Lincoln, NE 68588-0517
Telephone (402) 472-3471

Geological and Natural Resources Surveys

October 7, 1983

RECEIVED
OCT 12 1983
POLICY RESEARCH

Ms. Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, Nebraska 68509-4601

Dear Gayle,

The comments below and the attached engineering report by Olsson Associates (OAR) are in response to my review of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS).

959 The WNSIS gives an erroneous impression of the Kimball city water supply on pages 7-18 and 7-19, Volume 2. The WNSIS states well production and total pumping capacity levels which are misleading because (1) several of the city's in-town wells pump air or sand if pumped at capacity (OAR, p. 14), and (2) the six city wells do not pump at their stated capacities even during peak demand periods (OAR, p. 8). Also, the higher yielding out-of-town wells influence, and are influenced by, nearby irrigation wells (OAR, p. 12-13). The city of Kimball is concerned about this mutual interference (OAR, p.1).

960 The use of the unrealistically high production and total capacity values in the WNSIS results in the conclusions that (1) the city of Kimball has an excess water-supply capacity, and (2) the 3.7 percent projected (MX-related) increase over baseline monthly demands for water in 1989 will not require new facilities. These conclusions should be reevaluated.

958 It should be noted that, at a meeting on June 16, 1983, at the Panhandle Resources Council, Scottsbluff, Nebraska, I told the Land Use Program Manager from URS-Berger, Ms. Toni Curtis, that the city of Kimball was concerned about its municipal water supply and had commissioned an engineering firm to make recommendations about future needs for a new well. In addition, I handed a copy of the engineering report to her at the June 16, 1983 meeting. However, the WNSIS makes no mention of the report in either the text or the references sections. And, as outlined above, the WNSIS presents an erroneous impression of the water supply of the city of Kimball because of the omission of data presented in the engineering report.

Sincerely,

Warren Barrash
Research Hydrogeologist
Conservation and Survey Division
Panhandle Station, Scottsbluff NE 69361

University of Nebraska-Lincoln University of Nebraska at Omaha University of Nebraska Medical Center

ENGINEERING REPORT

NEW WELL LOCATION SURVEY

FEBRUARY, 1983

CITY OF KIMBALL
223 SOUTH CHESTNUT STREET
KIMBALL, NEBRASKA 69145

OLSSON ASSOCIATES
CONSULTING ENGINEERS
SUITE 611 NBC CENTER
LINCOLN, NEBRASKA 68508

OLSSON ASSOCIATES
CONSULTING ENGINEERS · ARCHITECTS
ESTABLISHED 1955
SUITE 611 NBC CENTER
LINCOLN NEBRASKA 68508
402 474 6311

9 February 1983

Chairman and Board of Public Works
c/o Robert Arraj, City Administrator
City Offices
223 South Chestnut Street
Kimball, Nebraska 69145

Re: Engineering Report
New Well Location Survey
Kimball, Nebraska
Project No. 104-82

Ladies and Gentlemen:

In accordance with our agreement with the City of Kimball, dated 12 March 1982, we have worked with the City to collect data, analyze it, and make calculations to determine the future needs for a new well. Our findings and recommendations are contained in the following report.

We would like to thank Bob Arraj and Joe Merante for their assistance in collecting the data necessary in preparation of this report. We trust the information contained in the report will aid you in the orderly planning and implementation of the works proposed.

Yours very truly,

M. Kent Prior

Arthur D. Beckard
For the Firm

lh
encls.

ENGINEERING REPORT

NEW WELL LOCATION SURVEY

KIMBALL, NEBRASKA

FEBRUARY 1983

Board of Public Works

Stan Juelfs - Chairman
Joe LeMay
Jack Myers
Mike Nelson
Jim Spargo

Wayne Rubbins - Mayor

City Council

Bill Batterton
C. M. Benstead
Gary Robinson
Edith Haines

Florence LeMay - City Clerk

Darrell Huenergardt - City Attorney

Robert E. Arraj - City Administrator

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Appendix A - Registered Well Records
Appendix B - Kimball Water Study Data

Purpose and Scope

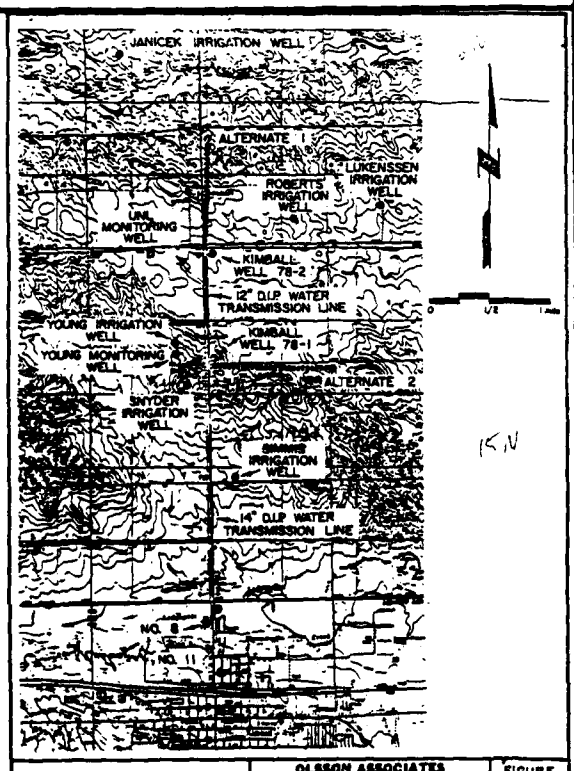
The purpose of this study and report is to (1) review the effect of existing City wells on the ground water supply north of Kimball; and (2) determine locations for future water supply utilizing the existing transmission pipeline. The City of Kimball realizes the importance of irrigated agriculture to the community and wishes to continue its "good neighbor" approach that it uses in its programs.

Studies and recommendations set forth herein were made in accordance with the contract dated 12 March 1982.

The scope of this study is to:

1. Log usage of existing City wells and evaluate usage pattern.
2. Secure and review current data available on ground water levels in the Kimball area since completion of the Water Supply Study - 1975.
3. Locate and secure available data on existing irrigation wells in the immediate area of City Wells 78-1 and 78-2. See Figure 1.
4. Monitor and log the static and dynamic water levels in the existing City wells located in town and north of town.
5. Monitor and log quantity of water pumped from City wells and irrigation wells where possible.
6. Monitor and log the static and dynamic water levels in irrigation wells immediately adjacent to City Wells 78-1 and 78-2 where permission can be secured. Determine influence of City wells on adjacent irrigation wells and visa-versa.
7. Establish minimum spacing to be maintained between existing and future wells.

8. Outline test hole drilling program to determine suitable location for development of a new well.
9. Review test hole data and summarize analysis of test hole data for anticipated well yield.
10. Recommend future well location.



KIMBALL WATER STUDY AREA | OLSSON ASSOCIATES CONSULTING ENGINEERS-ARCHITECTS | FIGURE 1

Existing Ground Water Conditions

Test hole data from the drilling of the City Wells 78-1 and 78-2 north of Kimball indicate that these wells are drilled into an "artesian" or "confined" aquifer. The aquifer is located between relatively impermeable or significantly less permeable material and is actually under pressure. When a well penetrates the upper confining material, the ground water level will rise to some level above the top of the aquifer. The water level in the well represents the artesian pressure in the aquifer. As a well is pumped, the water level in the well is drawn down thus lowering the artesian pressure at that point. The artesian pressure surface is not affected at some distance away from the well. This distance is known as the radius of influence. Within this distance the artesian pressure surface forms what is referred to as a "cone of depression". Any wells located within the radius of influence will be affected by the cone and will have their water levels lowered accordingly. A well pumping from an artesian aquifer has a much larger radius of influence than for a non-artesian aquifer. This is due to the fact that you are relieving pressure, which is felt through a much larger portion of the aquifer than if you only lowered an actual saturated water surface.

The practical effect is that when a high capacity well starts pumping, the aquifer reacts very fast and will affect the water surface for miles around it. When more wells start pumping, the water surface is lowered more. An actual dewatering of the aquifer does not occur until the water level lowers below the top of the aquifer, losing the artesian pressure effect.

The artesian pressure head for the 2 City wells drilled in 1978 was approximately 50 to 60 feet, meaning the water level in the wells rose that much higher than the top of the aquifer. Water level records indicate that the regional water level has declined about 5 feet since 1972. See Figure 2. The water level experienced a sharp water level decline in 1978 due to rapid development of irrigation wells in 1977. Registered irrigation well records indicate that for the study area two wells were drilled in 1970, one in 1974, and two in 1977. At the

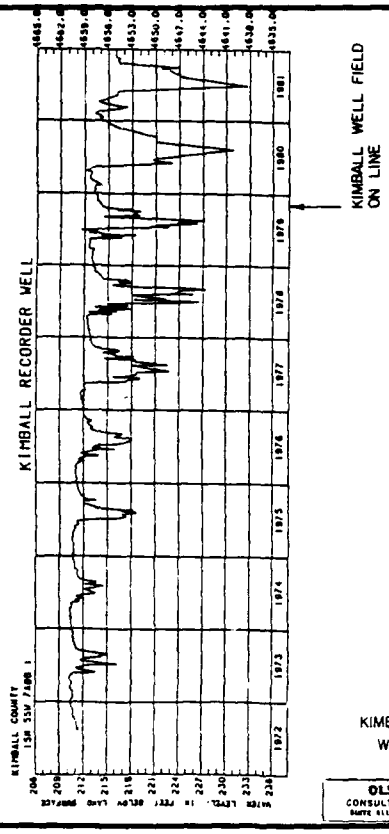


FIGURE 2
KIMBALL RECORDER
WELL RECORDS

OLSSON ASSOCIATES
CONSULTING ENGINEERS-ARCHITECTS

end of 1978, the average annual net water-level change since 1972 was -0.43 feet. This trend of water-level declines was occurring previous to the start-up of the City wells but after the 1975 Water Supply Study.

Existing Irrigation Development

The existing irrigation development in the study area of 2 miles either side of the existing City wells is shown in Figure 1. The approximate location of these wells, with respect to the 2 City wells, is as follows:

Dr. Young's Well	2,100 feet North Northwest of City Well 78-1 (South Well)
V. Snyder	2,100 feet Southwest of City Well 78-1
Simms	5,200 feet South of City Well 78-1
J. Roberts	3,700 feet Northeast of City Well 78-2 (North Well)
O. Lukassen	7,900 feet North Northeast of City Well 78-2
O. Janicek	10,000 feet North Northwest of City Well 78-2

Several other wells in the area have been utilized for monitoring water levels. The location of these wells is shown on Figure 1 and is as follows:

1. URL Recorder Well	2,600 feet West of City Well 78-2 (Continuous Recorder)
2. Dr. Young's Abandoned Well	2,100 feet North Northwest of City Well 78-1 (200 feet South of Irrigation Well)

Registered well information for these wells is contained in Appendix "A" to this report.

Kimball City Wells Pump Test - 1978

A 24 hour pumping test on each new well was performed by the Contractor as a part of the well construction. The north well was tested on 5-6 July 1978 with the following results:

24 feet drawdown @ 1,200 gpm (2 hours)
6 feet drawdown @ 200 gpm (2 hours)
18 feet drawdown @ 800 gpm (20 hours)

Dr. Young's abandoned well was used as an observation well for these tests. Several observations were noted during this test:

1. Dr. Young's irrigation well was pumping at the start of the test. A storm moved through the Kimball area and lightning caused the irrigation well to stop. The observation well water level rose 10 feet and City well water level rose 3 feet when that happened.

2. The observation well water level rose approximately 1.5 feet when the City well test ended and was 8.8 feet higher than when the City well test started.

3. The ground water level in the City well two hours after the test ended was 3 feet higher than when the test began. It was measured 18.5 hours after the test ended and was 7 feet higher than when the test began. The storm that passed through the Kimball area supplied enough moisture that no irrigation wells were being pumped during that time period.

The 24 hour pump test on the south City well occurred 8-9 August 1978 with the following results:

30 feet drawdown @ 1,200 gpm (2 hours)
6 feet drawdown @ 200 gpm (2 hours)
22 feet drawdown @ 800 gpm (20 hours)

Several observations were noted during this test:

1. Dr. Young's and Robert's pumps were running at the start of the test. The Lukassen pump started 1 hour into the test. Snyder's pump started 2 hours into the test and was shut off 8 hours into the test. Dr. Young's irrigation piping was changed from center pivot to gravity 18 hours into the City well test.

2. Snyder's pump caused approximately 1 foot of drawdown to the City well when it was pumping. Dr. Young's piping change caused the water level to be 3.5 feet lower in the observation well and 1 foot lower in the City well. This is probably due to the irrigation pump producing at a higher rate because of the lower pressure of the gravity pipe system. The water level in the observation well rose about 1 foot when the City well test ended.

Usage Pattern for City Wells

The City of Kimball utilized 6 different wells for water supply during the high demand period. The usage of each during the period June 1 - September 30 is as follows:

North Well Pumped 36% of Possible
South Well Pumped 51% of Possible
Well #11 Pumped 5% of Possible
Well #9 Pumped 7% of Possible
Well #8 Pumped 11% of Possible
Well #3 Pumped 9% of Possible

The worst 3 day period for pumping in 1982 occurred 25, 26, and 27 July. The well usage was as follows:

North Well Pumped 91% of Possible
South Well Pumped 84% of Possible
Well #11 Pumped 40% of Possible
Well #8 Pumped 67% of Possible
Well #9 and #3 - Data Not Available

During each day, the water level in the City elevated storage reservoir dropped until 8:00 to 9:00 in the evening. The water system demand then lowered such that the wells replenished the storage reservoir and shut off. On the 25th, the storage reservoir was not replenished until 4:30 a.m.

The normal usage pattern is for the north and south wells to do all the pumping. When the demand exceeds their capacity, the in-town wells are used. Well's #9 and #3 are operated manually, the others are controlled based upon the level in the storage reservoir. When the demand is very low, either the north or south well is not used for alternate months to save on electrical demand charges.

The daily usage for the City north well, south well, Well #11, and Well #8 is reported in Appendix "B".

Quantity Pumped From Wells

City of Kimball Wells

The quantity of water pumped from the City wells during the period of 1 June - 30 September 1982 is summarized below.

Well	Average Flow Rate gpm	Total (6/1-9/30) Gal.	Ac. Ft.	kWhr (6/1-8/31)	Average (6/1-9/30) gal./day	Peak (7/25, 26, 27 gal./day
North	700	87,800,000	269	5,579	363,000	917,000
South	700	124,400,000	382	6,897	514,000	847,000
#11	400	6,900,000	21		28,800	230,000
#8	360	13,800,000	42		57,000	347,000
#9	260	3,241,800	10		26,600	*
#3	200	3,200,700	10		26,200	*
Total:		239,342,500	734		1,015,600	2,341,000+

*Data for these wells were not available.

During the maximum day in 1982, 27 June, all wells were operating for an estimated combined flow rate of 2,620 gpm. Records were not available for daily pumping of Wells #9 and #3. The other 4 wells pumped a total of 2,341,000 gallons or a 24 hour average rate of 1,626 gpm on that day. It is estimated that the contribution of Wells #9 and #3 increased the 24 hour average rate to over 2,000 gpm.

Private Irrigation Wells

The usage patterns of the irrigation wells is not well defined. The amount of rainfall during 1 June - 30 September was 7.17 inches above normal for Kimball. Specific daily rainfall is in Appendix "B". The longest period without rainfall was 11 days near the end of July. The City of Kimball read the kWhr meter on several of the irrigation well motors. This information, along with the registered flow rate for the wells, is reported below.

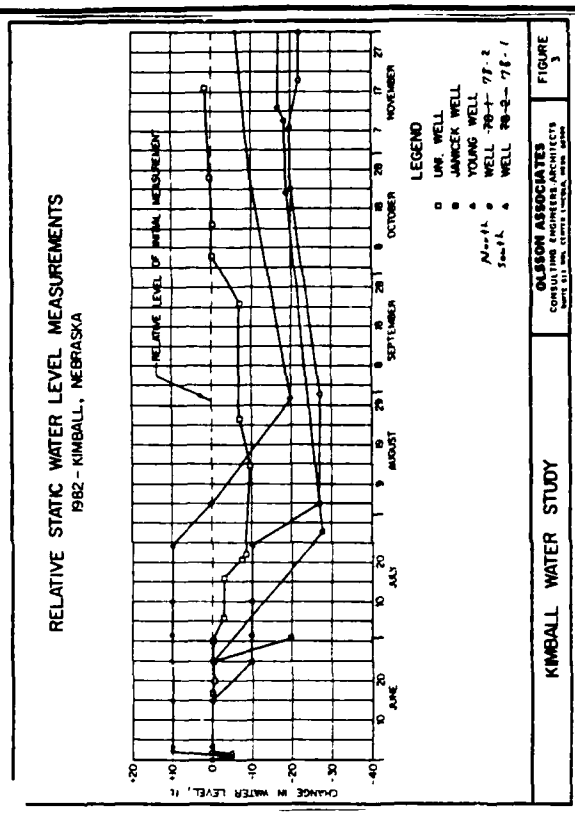
Irrigation Wells

1.	Janicek	700 gpm ±	254 kWhr	6/25 - 8/14
2.	Roberts	1,400 gpm ±	2,548 kWhr	6/25 - 8/13
3.	Lukassen	1,200 gpm ±	0 kWhr	6/25 - 8/4
4.	Snyder	800 gpm ±	299 kWhr	7/27 - 8/4
5.	Simms	400 gpm ±	0 kWhr	7/27 - 8/4
6.	Young	(Not Registered)	(No Data Collected)	

Water Level Measurements

The City of Kimball collected data on ground water levels for the wells included in this study. The north and south City wells had air lines already installed and the other wells were measured using an electric water level indicator probe. Only the Janicek and Dr. Young's abandoned well were set up to be able to monitor the water levels with the probe. Static and pumping water levels were recorded and is reported in Appendix "B". The static and pumping level reported for Dr. Young's well is the level measured in the abandoned well 200 feet from the irrigation well when the pump was running.

The change in static (non-pumping) water levels is presented in Figure 3. All readings are relative to the initial measurement. As can be seen from the graph, the City south well and Young's well indicate very similar trends. This is probably due to the proximity of each to the other. Also included is data obtained by the University of Nebraska recorder well.



Influence of Wells

The wells in the study area tend to affect each other due to the nature of the artesian aquifer into which they are installed. The best data available to demonstrate the influence was obtained during the Kimball City well pumping tests. This information is summarized as follows:

During North Well Test

1. North well caused 1.5 feet drawdown in observation well. (Observation well located 200 feet from Dr. Young's irrigation well).
2. Dr. Young's irrigation well caused 3 feet drawdown in City well.
3. Dr. Young's irrigation well caused 10 feet drawdown in observation well.
4. 24 hours after test over, static level 7 feet higher than at start of test (no wells pumping).

During South Well Test

1. Snyder's pump caused 1 foot drawdown to City well.
2. City well caused 1 foot drawdown to observation well.
3. Dr. Young's piping change caused extra 3.5 feet drawdown to observation well.
4. Dr. Young's piping change caused extra 1 foot drawdown to City well.

Minimum Spacing

Data from the Kimball City well pump tests were analyzed in detail. Aquifer characteristics were determined to be:

Transmissivity = 84,000 Gallons/Day/Foot
Storage Coefficient = 0.00026

A theoretical approach was used to determine the minimum spacing for any new wells using the above aquifer characteristics.

The Theis equation for nonsteady radial flow without vertical movement was programmed into a computer and the following results obtained:

Conditions:

Well Flow Rate	750 gpm
Time Since Start of Pumping	24 Hours
Transmissivity	84,000 Gal./Day/Foot
Storage Coefficient	0.00026

Drawdown Feet	Distance From Well Feet
1.0	6,850
2.0	3,875
3.29	2,000

Based on this information, it is recommended that a minimum spacing of 2,000 feet between high capacity wells be maintained in the future.

Test Hole Program

The City of Kimball has indicated a desire to add more capacity to its water supply. Several of the wells in town are occasionally pumping air or sand, thus their capacity should be reduced to avoid these problems. The aquifer for the in-town wells will yield approximately 400 gpm maximum, while the aquifer for the out-of-town wells will yield up to 1,000 gpm or more. As mentioned previously, one of the purposes of this report is to locate new supply to utilize the existing transmission pipeline. Two (2) alternates are presented to locate a future source of water supply. See Figure 1.

Alternate 1

Alternate 1 consists of locating a 750 gpm well 1 mile north of the existing north well along Highway 71. A 12 inch diameter transmission pipeline would extend along the Highway. Access to the well site would be very convenient. This alternate is hydraulically not the best solution because of the need to transfer water into the existing 12 inch diameter pipe at the north well. Adequate measures can be taken in designing the pump to overcome this disadvantage. An advantage is that the well would be located in a rugged topographical area, thus minimizing competition for ground water. A well in this area would allow the City to obtain a reliable source of supply while at the same time not impede the irrigated agriculture of the area. A test hole with casing to be used as a monitoring well is included.

Approximate Cost

Test Hole with Casing	$ 3,300
Well with Building	85,000
12 Inch Pipeline	91,000
	$179,300

Alternate 2

Alternate 2 consists of a 750 gpm well located 1 mile east of the existing south well. The route of a 12 inch diameter transmission line would be in a privately owned field. Access to the well site would not be as convenient as the existing wells. A new access road

would have to be built and maintained. Hydraulically, this is the better alternate as the transmission line from this well would connect into a 14 inch diameter pipe instead of a 12 inch. The topography of this area is such that it is subject to future irrigation development. A test hole with casing to be used as a monitoring well is included.

Approximate Cost

Test Hole with Casing	$ 3,300
Well with Building	85,000
12 Inch Pipeline	91,000
Road with Gravel	15,000
	$194,300

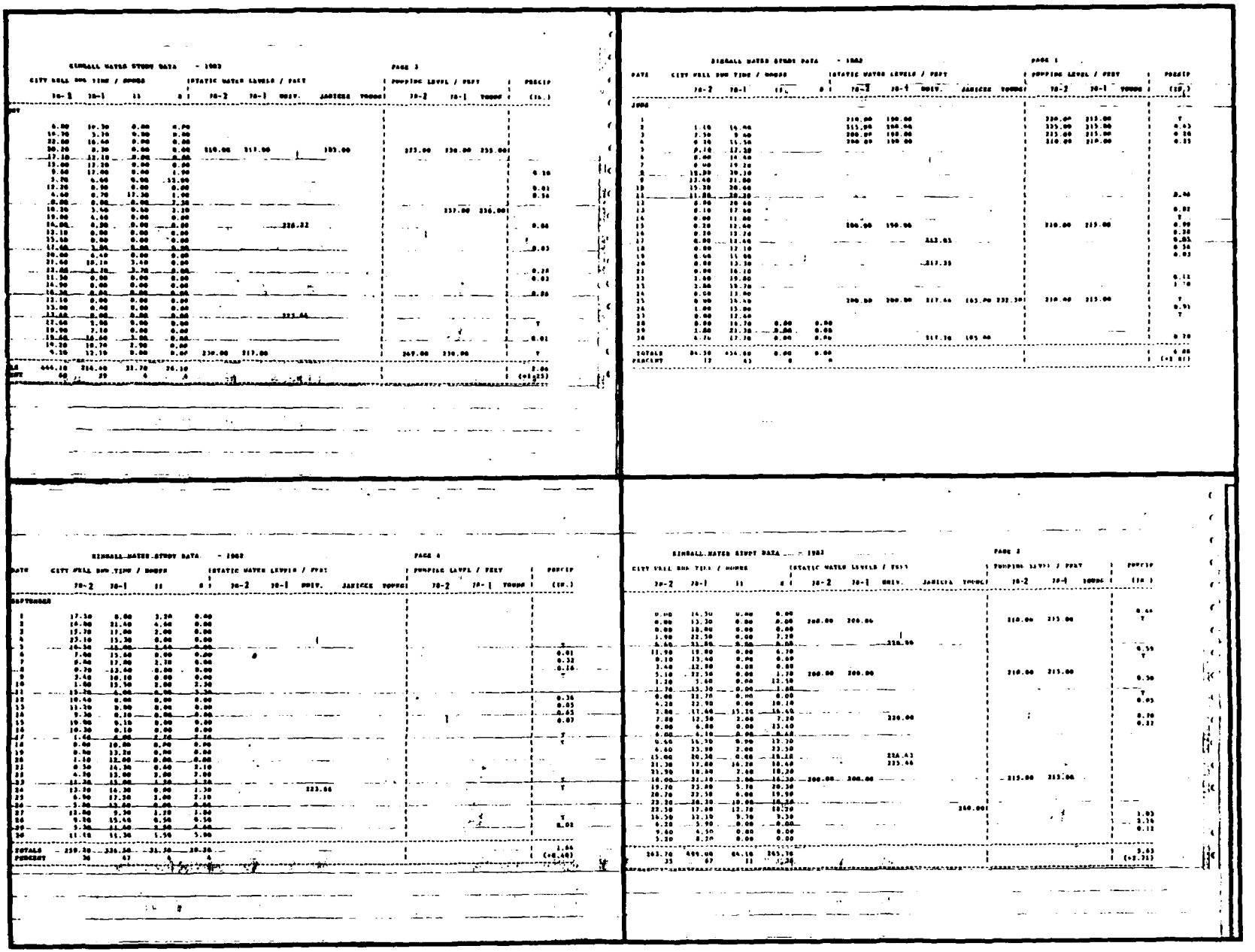
Recommendations

It is recommended that Alternative 1 be selected and action be taken to obtain an option for a well site at this location. Conflicts with potential irrigation development is minimized along with maintaining easy access to the well site. It is further recommended that a test hole be drilled and cased.

The ground water level could be monitored for 1 year to determine the effect of existing irrigation wells at that site. This information would be very valuable in the design of a high capacity well and pump.

The City's south well during 1982 was utilized more than the north well. Due to its location near Dr. Young's irrigation well, there is a large demand for water in a small area. As can be seen from Figure 3, the relative water levels are lower than for the north well. It is recommended that the City's north well be utilized more to minimize these conflicts.

APPENDIX "A"



KIMBALL WATER STUDY DATA - 1983

PAGE 3

DAY	CITY WELL DOWN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	SHELV.	JANICKE	TOPPER	PUMPING LEVEL / FEET 78-2	78-1	TOPPER	PRECIP (IN.)
MAY													
	6.00	10.30	0.00	0.00									
	10.70	5.30	0.00	0.00									
	22.00	10.00	0.00	0.00									
	20.00	0.30	0.00	0.00	310.00	317.00		195.00		273.00	230.00	235.00	
	17.30	12.30	0.00	0.00									
	13.00	12.30	0.00	0.00									
	9.00	12.00	0.00	1.00									0.10
	3.00	6.00	0.00	.55.00									
	12.30	0.30	0.00	0.00									0.01
	6.00	0.30	12.30	1.00									0.54
	0.00	0.00	0.00	2.30									
	10.30	3.00	0.30	3.30						337.00	336.00		
	19.00	4.00	0.00	0.00									
	14.00	0.00	0.00	0.00			328.32						0.00
	12.10	0.00	0.00	0.00									
	15.50	0.00	0.00	0.00									T
	17.00	3.00	0.00	0.00									0.03
	20.00	6.40	0.00	0.00									
	21.00	10.10	3.40	0.00									
	22.00	6.30	3.30	0.00									0.20
	11.50	0.00	0.00	0.00									0.03
	14.00	0.00	0.00	0.00									
	16.30	0.00	0.00	0.00									0.06
	13.10	0.00	0.00	0.00									
	13.00	0.00	0.00	0.00									
	17.00	0.00	0.00	0.00			323.66						T
	17.00	5.00	0.00	0.00									
	19.00	7.10	0.00	0.00									
	19.00	10.00	3.00	0.00									0.01
	19.20	10.70	2.00	0.00									
	9.30	12.10	0.00	0.00	230.00	317.00				267.00	230.00		T
	444.10	216.00	31.70	26.10									2.06
PERCENT	60	29	4	4									(+0.23)

KIMBALL WATER STUDY DATA - 1983

PAGE 1

DATE	CITY WELL DOWN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	SHELV.	JANICKE	TOPPER	PUMPING LEVEL / FEET 78-2	78-1	TOPPER	PRECIP (IN.)
JUNE													
						310.00	190.00				330.00	315.00	T
1	1.10	14.40				315.00	190.00				335.00	315.00	0.43
2	7.50	9.40				300.00	190.00				315.00	315.00	0.30
3	0.30	15.50				300.00	190.00				310.00	310.00	0.33
4	0.00	14.40											
5	0.10	12.30											
6	0.00	19.20											
7	0.00	19.20											
8	10.00	20.10											
9	12.40	21.00											
10	15.30	20.40											
11	11.00	20.30											0.00
12	0.00	20.50											T
13	0.10	17.50											0.02
14	0.00	11.00											T
15	0.30	12.40				300.00	190.00				310.00	315.00	0.00
16	0.30	13.20											0.30
17	0.00	13.40						333.01					0.05
18	0.00	12.10											0.50
19	0.00	11.00											0.02
20	0.00	13.30						317.33					
21	0.00	16.10											
22	1.00	19.00											0.12
23	2.00	19.30											1.10
24	0.00	13.40											
25	0.00	16.40				300.00	300.00	317.66	165.00	332.30	310.00	315.00	T
26	0.00	15.00											0.91
27	1.00	13.00											T
28	0.00	12.40											
29	0.00	10.70	0.00	0.00									
30	0.00	21.30	0.00	0.00									
31	0.70	17.30	0.00	0.00				317.70	165.00				0.20
TOTALS	54.30	454.00	0.00	0.00									6.85
PERCENT	12	63	0	0									(+2.87)

KIMBALL WATER STUDY DATA - 1983

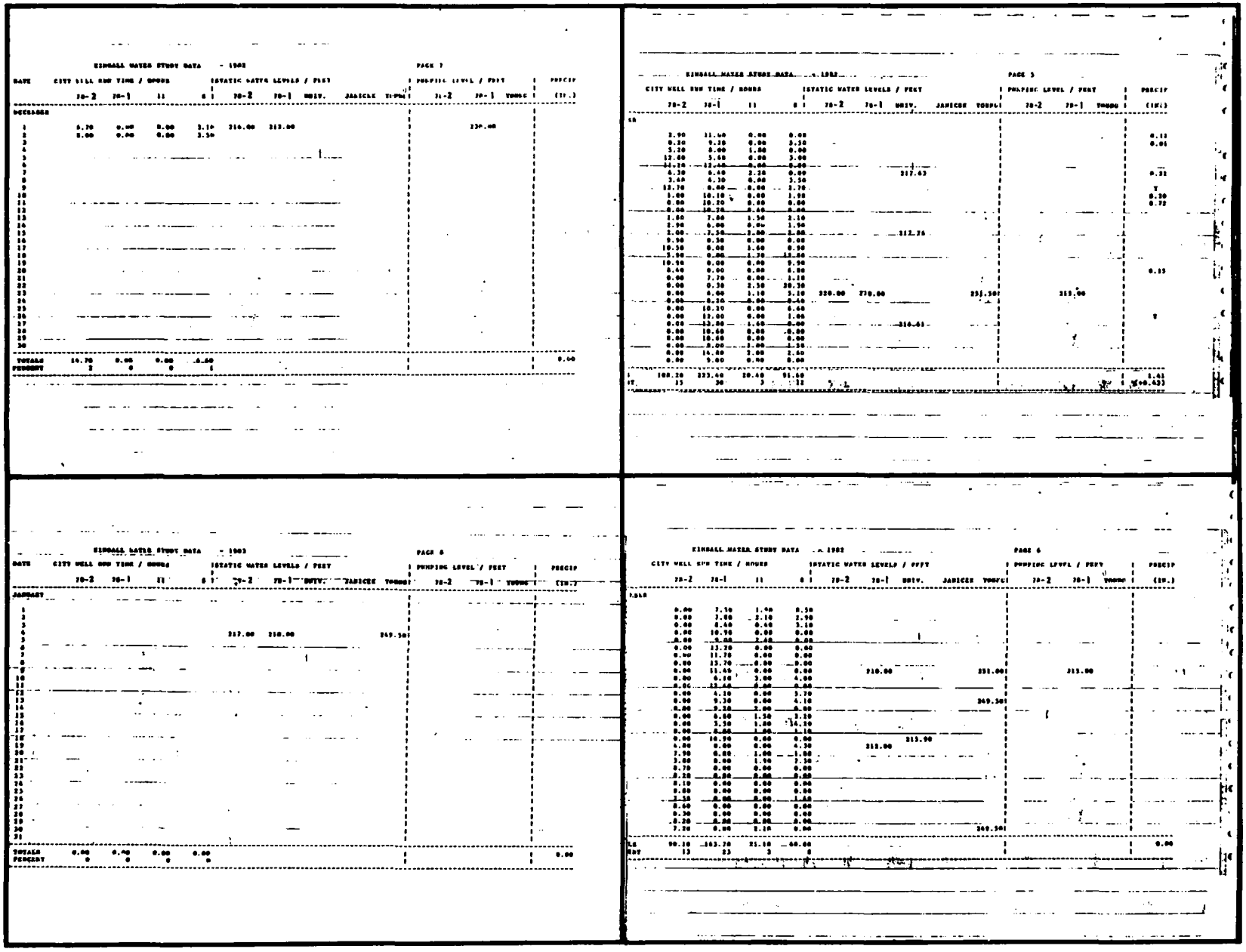
PAGE 4

DATE	CITY WELL DOWN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	SHELV.	JANICKE	TOPPER	PUMPING LEVEL / FEET 78-2	78-1	TOPPER	PRECIP (IN.)
SEPTEMBER													
1	17.30	0.00	3.30	0.00									
2	16.00	21.30	4.00	0.00									
3	17.70	17.00	2.00	0.00									
4	23.10	15.30	0.00	0.00									T
5	24.00	15.00	1.00	0.00									0.01
6	7.00	13.00	0.00	0.00									0.32
7	0.00	17.00	2.30	0.00									0.10
8	0.70	12.00	0.00	0.00									T
9	0.00	10.00	0.00	0.00									
10	1.00	13.50	2.00	2.30									
11	13.70	6.00	0.00	3.30									0.36
12	10.00	0.00	0.00	0.00									0.03
13	11.30	0.00	0.00	0.00									0.65
14	9.30	0.30	0.00	0.00									0.07
15	10.00	0.10	0.00	0.00									
16	10.30	0.10	0.00	0.00									T
17	7.00	0.00	2.30	2.30									T
18	0.00	10.00	0.00	0.00									
19	0.00	13.20	0.00	0.00									
20	0.00	12.00	0.00	0.00									
21	0.30	14.30	0.00	2.10									
22	4.30	13.00	2.00	2.00									
23	14.00	15.00	1.00	1.30									T
24	13.30	14.30	0.00	1.30			323.66						T
25	6.90	17.30	1.00	2.10									
26	3.00	13.00	0.00	0.00									
27	12.00	9.30	1.30	0.00									T
28	9.30	15.40	0.30	0.30									0.02
29	5.30	11.00	0.00	0.00									
30	11.10	11.30	1.30	0.00									
TOTALS	259.30	330.30	31.30	20.30									1.66
PERCENT	36	47	4	3									(+0.48)

KIMBALL WATER STUDY DATA - 1983

PAGE 2

DATE	CITY WELL DOWN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	SHELV.	JANICKE	TOPPER	PUMPING LEVEL / FEET 78-2	78-1	TOPPER	PRECIP (IN.)
	0.00	14.30	0.00	0.00									
	0.00	13.30	0.00	0.00	200.00	300.00				310.00	315.00		0.44
	0.00	10.00	0.00	0.00									T
	1.00	22.50	0.00	7.30									
	0.00	23.00	0.00	0.00			330.00						
	11.00	10.00	0.00	6.30									0.59
	0.10	13.00	0.00	0.00									T
	0.10	13.00	0.00	0.00									
	5.10	22.30	0.00	1.30	200.00	300.00				310.00	315.00		0.30
	1.20	1.00	0.00	12.10									
	1.30	13.30	0.00	1.00									T
	0.00	12.30	0.00	0.00									0.05
	4.30	22.00	0.00	10.10									
	7.00	17.00	13.30	15.00									0.30
	7.00	12.30	2.00	7.30			330.00						0.32
	0.00	6.00	0.00	13.40									
	6.00	6.10	0.00	0.00									
	0.00	11.30	0.00	13.30									
	4.00	23.30	2.00	23.30									
	15.00	20.30	0.00	18.10			324.43						
	21.30	12.00	16.30	20.00			333.66						
	23.00	10.00	7.00	10.20									
	18.00	22.30	2.00	16.30	200.00	300.00				315.00	313.00		
	19.70	23.00	5.70	20.30									
	20.70	22.30	6.00	19.00									
	23.00	20.30	10.00	16.30									
	22.30	17.00	12.70	10.20					350.00				
	16.30	23.30	9.30	9.30									1.03
	6.20	5.00	0.00	0.00									3.35
	9.60	6.50	0.00	0.00									0.11
	5.20	8.20	0.00	0.00									
	303.70	499.00	84.10	365.30									5.63
	35	57	11	1.20									(+2.71)



KINSALL WATER STUDY DATA - 1982

PAGE 7

DATE	CITY WELL RUN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	BRIV.	JANICKE	TOWN 6	PUMPING LEVEL / FEET 78-2	78-1	TOWN 6	PRECIP (IN.)
DECEMBER													
1	5.70	0.00	0.00	3.10	216.00	213.00					230.00		
2	5.00	0.00	0.00	3.50									
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25													
26													
27													
28													
29													
30													
TOTALS	10.70	0.00	0.00	6.60									0.00
PERCENT	3	0	0	1									

KINSALL WATER STUDY DATA - 1982

PAGE 5

CITY WELL RUN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	BRIV.	JANICKE	TOWN 6	PUMPING LEVEL / FEET 78-2	78-1	TOWN 6	PRECIP (IN.)
3.90	11.60	0.00	0.00									0.11
0.30	9.30	0.00	3.30									0.01
5.20	0.00	1.80	0.00									
12.00	5.10	0.00	3.00									
11.20	12.40	0.00	0.00									
6.30	6.40	2.30	0.00			317.63						0.31
3.40	6.30	0.00	3.50									
13.70	0.00	0.00	3.70									
1.00	10.10	0.00	1.30									0.30
0.00	10.20	0.00	0.00									0.72
0.00	10.20	0.00	0.00									
1.00	7.80	1.50	2.10									
2.00	6.00	0.00	1.90									
1.00	7.50	1.00	1.00			317.75						
9.90	0.30	0.00	0.00									
10.30	0.00	1.60	0.00									
3.90	0.00	1.70	12.00									
10.50	0.00	0.00	5.90									
5.40	0.00	0.00	6.00									0.33
0.00	7.70	0.00	1.10									
0.00	0.30	2.30	20.30									
0.00	0.00	1.10	5.10	220.00	210.00		231.50		213.00			
0.00	0.30	0.00	0.60									
0.00	10.30	0.00	6.60									
0.00	12.00	0.00	1.00									
0.00	12.00	1.60	0.00			316.63						
0.00	10.60	0.00	0.00									
0.00	10.60	0.00	0.00									
0.00	0.00	1.00	1.50									
0.00	14.80	1.00	2.60									
0.00	9.00	0.00	0.00									
188.30	223.60	20.60	91.60									1.83
17	15	30	3	12								0.43

KINSALL WATER STUDY DATA - 1982

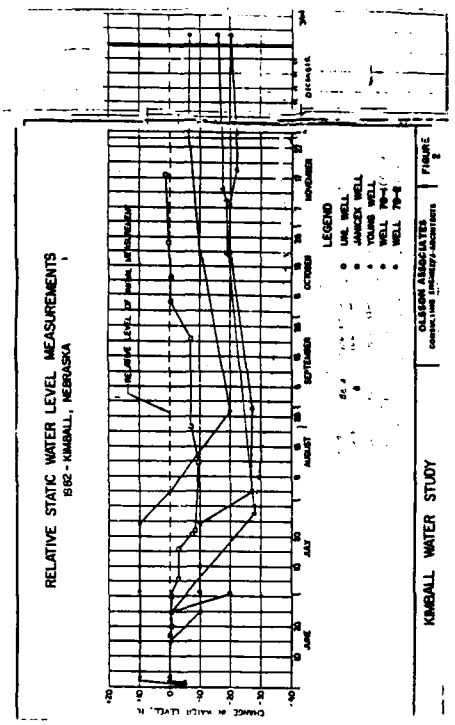
PAGE 8

DATE	CITY WELL RUN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	BRIV.	JANICKE	TOWN 6	PUMPING LEVEL / FEET 78-2	78-1	TOWN 6	PRECIP (IN.)
JANUARY													
1													
2													
3					217.00	210.00		249.50					
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25													
26													
27													
28													
29													
30													
31													
TOTALS	0.00	0.00	0.00	0.00									0.00
PERCENT	0	0	0	0									

KINSALL WATER STUDY DATA - 1982

PAGE 6

CITY WELL RUN TIME / HOURS 78-2	78-1	11	8	STATIC WATER LEVELS / FEET 78-2	78-1	BRIV.	JANICKE	TOWN 6	PUMPING LEVEL / FEET 78-2	78-1	TOWN 6	PRECIP (IN.)
0.00	7.50	1.90	0.50									
0.00	7.80	2.10	2.90									
0.00	0.40	0.40	3.10									
0.00	10.70	0.00	0.00									
0.00	0.00	1.40	0.00									
0.00	13.70	0.00	0.00									
0.00	11.70	0.00	0.00									
0.00	13.70	0.00	0.00									
0.00	11.60	0.00	0.00		210.00		231.00		213.00			
0.00	6.10	3.00	4.00									
0.00	13.40	0.00	0.00									
0.00	4.10	0.00	3.70									
0.00	9.30	0.00	4.10				249.50					
0.00	5.10	0.00	0.00									
0.00	5.00	1.50	3.20									
0.00	5.30	1.00	14.30									
0.00	0.00	1.00	4.10									
0.00	10.70	0.00	0.00			213.90						
4.00	0.00	0.00	4.30		211.00							
7.90	0.00	1.00	1.00									
0.00	0.00	1.50	7.30									
0.70	0.00	0.00	0.00									
0.20	0.00	0.00	0.00									
0.10	0.00	0.00	0.00									
0.00	0.00	0.00	0.00									
1.10	0.00	0.00	1.40									
0.60	0.00	0.00	0.00									
0.30	0.00	0.00	0.00									
0.20	0.00	0.00	0.00									
7.70	0.00	0.10	0.00				249.50					
90.10	163.70	21.10	68.60									0.00
13	23	3	8									



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University of Nebraska Lincoln
Institute of Agriculture and Natural Resources

Conservation and Survey Division
113 Nebraska Hall
901 North 17th Street
Lincoln, NE 68588-0517
Telephone (402) 472-3471

Geological and Natural Resources Surveys

November 10, 1983

Ms. Gayle Malmquist
Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, Nebraska 68509-4601

Dear Gayle:

Below are several comments related to geology and hydrology subjects treated in the Draft Environmental Impact Statement (DEIS) on deployment of MX missiles in the southern Panhandle of Nebraska and southeastern Wyoming.

1471 1. As noted in section 1.6.10.2 Peacekeeper in Silo, (DEIS, p. 1-30 and 1-31) one of the "only potential sources of ignition" or "explosive detonation" is shock or ground motion such as may be generated by a seismic event (earthquake). The DEIS states (p. 1-30) that
"although one of the Launch Facilities lies within an area which may potentially be categorized as an active fault zone, the likelihood of ground rupture at the Launch Facility location, or sufficient ground motion to cause an explosive detonation, is extremely remote."
No quantification of the phrase "extremely remote" is offered, and no methodology used to arrive at this conclusion is presented.

Furthermore, section 2.2.3.2.1.2 Faulting and Fig. No. 2.2.3-3 (DEIS, p. 2-120 and 2-121) describe and illustrate how
"the trace of the Wheatland-Whalen Fault Zone trends northeast through T-flight and Silo T-2 lies within the fault zone itself while Silo T-3 is located close to the zone and T-9 lies along its projection. If active, there will be potential for ground rupture in the area of the fault zone."

The Draft Environmental Planning Technical Report on Geological Resources (1983) addresses faulting in section 2.6.2.2 Faulting (DEPTR, Geol. Res., p. 2-33 and 2-34). In this section, greater detail of the Wheatland-Whalen Fault Zone is presented and the conclusion is stated that
"based on the available data, the Wheatland-Whalen Fault System is considered active or capable of earthquake generation."
The final paragraph of this section (p. 2-34) states that
"preliminary estimates for a maximum credible earthquake on the Wheatland-Whalen Fault System could range up to a magnitude 7.5 depending on the relationships utilized (Ertec, 1983)."

While the upper bound on potential earthquake magnitude may be debated, the DEPTR concludes that the fault system is active with potential for a seismic

event at or adjacent to one or several T-flight MX silos. The potential magnitude of energy release by such a seismic event could cause enough shock and possible ground rupture to compromise the safety of MX missiles in silos there.

1471 It would be prudent, then, to find a safer substitute flight for the MX missiles scheduled to be based in T flight. If the Air Force insists on basing MX missiles in T flight, a detailed geologic study of the T flight region should be conducted and should include, but not be limited to: detailed geologic mapping, detailed study of all faults and fault zones in the region (including trenching of faults and fault zones, and including every effort to obtain reliable dates of and magnitudes of fault movements in the past), and establishment of a seismic network in the region to monitor current behavior.

2. With respect to detection of impacts on surface and groundwater quality related to site preparation and assembly and emplacement of MX missiles in silos, the Draft Environmental Planning Technical Report on Water Resources section 3.7.4.4 Monitoring and Modeling is extremely vague in outlining the commitment to or plan for monitoring impacts.

1293 Furthermore, the Monitoring and Modeling section makes no mention of water quality monitoring (as opposed to monitoring and modeling water-level changes). The final EPTR on Water Resources should give details of the monitoring program that will be established to detect changes in water quality related to MX-deployment activities.

3. Several sections dealing with aquifer properties in the DEIS fail to mention one or more of the most-used aquifers in the areas being discussed.

1327 In section 2.2.1.2.4.2 Other Areas (within the section on Groundwater Hydrology and Quality) on p. 2-103, mention is made of average well yields from the Chadron and Arikaree aquifers in the Pumpkin Creek area. However, the Chadron and Arikaree aquifers are hardly used at all in the Pumpkin Creek area - the important aquifers there are the Brule Formation and alluvium.

1328 In section 3.2.1.4.4.2 Proposed Action, Other Areas, potential water lowering figures are presented for the Ogallala and Arikaree aquifers, but estimates of water-level lowering due to pumpage in the Brule Formation and alluvium are not presented.

1285 4. Credit is not given to the Conservation and Survey Division of the University of Nebraska-Lincoln as a data and literature source to the preparers of the Water Resources section of the DEIS (section 2.2.1.1.2.1 Data Sources, p. 2-93) although staff time and documents were given freely in our offices at Lincoln and Scottsbluff.

I appreciate the information you have supplied to me during the course of the public-comment process. Please contact me if you require further comments or clarifications.

Sincerely,

Warren Barrash

Warren Barrash
Research Hydrogeologist
Conservation and Survey Division
Panhandle Station, Scottsbluff NE 69361

xc to Mr. Vincent H. Dreeszen, Director, Conservation and Survey Division
Dr. Marvin P. Carlson, Assistant Director, Conservation and Survey Division

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THE UNIVERSITY OF WYOMING
INSTITUTE FOR POLICY RESEARCH
LARAMIE, WYOMING 82071

Memorandum

To: Paul Cleary, State Planning Coordinator's Office

From: Shelby D. Gerking, Institute for Policy Research

Re: WHSIS Comments

Date: 14 Oct 83

The purpose of this memorandum is to provide my comments (together with those of two other University of Wyoming faculty, Larry Ostresh, Department of Geography and Carl Olson, Department of Agricultural Economics) on the WHSIS. The overall message is that the methodology is inadequately explained and documented. Quite frankly, we find it impossible to properly evaluate the validity of the resulting projections because of the inadequacies of Appendix A. To be more specific:

(i) In Appendix A.1, a regional input-output matrix was "guestimated" by multiplying the national matrix by a set of location quotients. While an inexpensive process, we question its validity based on the findings of Morrison and Smith (Journal of Regional Science, 1974). Reference to some articles evaluating its validity would be most helpful. Also, which region are they using for the location quotients? The seven counties defined as the Area of Site Influence or those counties plus the Denver SMSA and Larimer and Weld (mentioned on p. 2-10, Vol. I)?

241

What are the parameters of the constrained gravity model? How did they derive them? Such parameters are notoriously variable from place to place. We certainly hope they did not simply pluck them out of the air but have no alternative than to suspect they did since the documentation is so sketchy. We are pleased that a series of sensitivity analyses were performed on their economic model...(p. A-25). Perhaps at some point they will tell us what the results were!

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Is determining how much labor must come from outside the region, why is 4% used as the migration triggering unemployment rate? Are local labor force participation rates allowed to change in the face of increased economic activity occasioned by the Peacekeeper System? If so, how are the changes determined? How will the Peacekeeper affect wages paid by industry and occupation? Would not wage increase promote greater labor force participation and, thus, a smaller number of immigrants?

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When the model determines that immigrant workers are needed to satisfy local labor demand, how are their demographic characteristics projected? How are the demographic characteristics of accompanying dependents determined?

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For the equation on p. A-24, how were the parameters estimated and what are the values?

(ii) In Appendix A.2, a whoppingly erroneous assumption may have been made. Apparently, it says that the migration rates into the region that pertained from 1970 to 1980 are assumed to hold true over the planning period. (They say: "Migration was based upon historical rates at the county level for 1970-1980" (p. A-28)). But this was a period of rather rapid growth for Laramie County as shown below:

Year	Population	% Change
1950	47,737 (approx.)	----
1960	60,149	26%
1970	56,360	-6.3%
1980	68,649	21%

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To assume as a baseline that these high migration rates will continue is indefensible and will end up grossly underestimating the impact of the MX! This is the key county and the key projection variable: an error here has repercussions throughout the rest of the analysis.

257

Additionally, the explanation of the area to which the vital rates pertain is not clear. Are the survival rates calculated for the ASI or are national rates used, instead?

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How are special populations such as college students and military personnel handled for Laramie County in the demographic routines used?

(iii) In Section A.3, if most of the immigrants are construction workers, and if they choose mobile homes 53% to 60% of the time (Table A.3-4), then how reasonable is it to assume the housing distribution in Cheyenne will remain constant at 12% in mobile homes (Table A.3-2)? Yet that is what is assumed in spite of the fact that the change in percentage of mobile homes, 1970 to 1980, was 1, 240% (p. 3-323, Table 3.10.3-1).

345

(iv) In Section A.7, the methodology is not here described. Also, the last sentence is demeaning to all who read it:

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"Other transportation elements were analyzed using basic acceptable methods." (p. A-60)

Additionally, there are several things or areas that the Impact Study does not address at all or does not deal with adequately.

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The study makes no mention of agriculture in the area and how increased activity might affect agriculture and rural residents, both agricultural producers and residents of rural areas that are employed in non-farm and ranch jobs. The study leaves the impression that the project will have minimal total economic impact in the area. We wonder if the economic impacts might be much greater on the rural areas and production agriculture than the write-up suggests.

In particular, more attention should be paid to impacts of the MX or Peacekeeper system on the following:

866

(i) Costs of public utilities required by the project. Also, who pays for the new utility delivery system? All users or the additional users?

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(ii) Problems of rural subdivisions in terms of:
-Water quantity and quality
-Sewage
-Refuse
-Land Values
-Cost of transporting school children
-Conflict between agricultural production and the rural subdivision resident.

1061

(iii) Costs of rural road improvements required by the "system" (the study write-up does not reach much of a conclusion regarding the road system).
-Costs of the construction phase
-Costs of handling the post construction transportation problems.

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(iv) Another potential problem not addressed (and it may not be much of a problem) is the possible interference of normal agricultural related traffic by construction and post construction traffic.
-Delay in moving livestock in transit can cause additional shrink and be financial loss to the producer.

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-Recreation and property owner rights. (Nothing said about potential problems in this area.) Additional hunting and fishing in the area (as suggested in the study) may lead to trespass problems on private land and, unfortunately, vandalism to buildings, equipment and domestic livestock. Costs of such damages were not discussed and can be quite high for the individual.

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-Also, related to recreation, is off-road vehicular travel which can be very damaging to range land and disturbing to wildlife and domestic livestock.

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-The effects of increased demand for consumer loans by the increased population due to the project on the cost and availability of lower funds for production agriculture.

464

(v) The statement described impacts of the Project on existing public sector services. Very little information was presented on how pre-project residents would be impacted other than housing availability in communities. Such impacts are hard to measure, yet they should be indicated and some ordinal measurement of impact suggested.

cc: Robert A. Jenkins, Vice-President for Research and Graduate Studies, University of Wyoming

Fred Hickman, Human Resources Director, URS-Berger

THE UNIVERSITY OF WYOMING
UNIVERSITY STATION BOX 3166
LARAMIE, WYOMING 82071

November 14, 1983

Dr. Shelby D. Gerking, Director
Institute of Policy Research
University of Wyoming
Ross Hall
Campus

Dear Shelby:

Thank you for the opportunity to comment on the U.S. Air Force Environmental Impact Statement concerning the placement of MX missiles into Minuteman missile silos.

The E.I.S. addressed the impact of people moving into the cities of Cheyenne, Pine Bluffs, Wheatland, Torrington, Laramie, Kimball, Scottsbluff and Gering. Specifically, we have reviewed the following sections.

1) Sewage treatment
2) Water treatment
3) Stormwater transport capacity

Within the context of expected population growth within the region encompassing the above-mentioned cities, there appears to be very little additional impact expected on sewage and water treatment and on stormwater flow. The towns are experiencing (except for Kimball) growth rates in excess of what would be added by the relatively few people added by the MX program. Those additional people on the MX program will not appreciably increase the demand on treatment facilities.

834 We have some concern that calculations used in the EIS "assume" cities (e.g., Cheyenne, Torrington) will be upgrading their sewage treatment and stormwater transport systems. Is mitigation (or responsibility) to be assigned if expected population growth (with the MX) does not occur?

838 Should present estimates of per capita water consumption be low, the effect of additional water demand on treatment systems could be substantial, particularly for citizens of Cheyenne, Laramie and Gering.

Sincerely,

M. L. Bergman
Associate Professor

T. W. LaPoint
Assistant Professor

MLB:ald

THE UNIVERSITY OF WYOMING
RECREATION AND PARK ADMINISTRATION
UNIVERSITY STATION BOX 3067
LARAMIE, WYOMING 82071

November 11, 1983

TO: Shelby Gerking, Director I.P.R.

FROM: Tom Buchanan and Lawrence R. Allen TB LRA
Department of Recreation & Park Administration

RE: Draft EIS For the Peacekeeper Missile

239 1. Sect. 1.1, Page 1-3, Table 1.1-1, Table 1.2-1 - Anticipated impacts are based upon manpower requirements associated with the project. No mention is made of the large number of transient (and frequently unemployed) workers who follow these types of projects in an attempt to find employment. Based upon past history at other impacted areas in Wyoming, it is reasonable to assume that population impacts will exceed population growth associated with manpower requirements.

1344 2. Sect. 1.1, Page 1-10, Table 1.1-3 - Material resources needed for construction include 5lb acre feet of water. No mention is made of where this water will come from. If the water is to be diverted from one of the state parks in the ACS, it could impact the quality of recreation services. This issue is never addressed.

1206 3. Sect. 2.4.2.1, Page 2-12 - We seriously question the accuracy of using data provided in the 1980 Wyoming SCORP. Most of these data were collected at least two to three years before the SCORP publication date. Also, Dr. Buchanan as a member of the SCORP Advisory Board, recalls considerable criticism being raised regarding the technical accuracy of much of the SCORP data. The fact that existing data sources are less than comprehensive and/or accurate does not negate the responsibility of the lead agency to provide accurate data. Additionally, we would like to see documentation of the verbal estimates of recreation planners associated with state agencies. Without this documentation the lead agency has the license to modify data and attribute that modification to some unknown planner.

1207 4. Sect. 2.4.2.2, Page 2-13 - N.R.P.A. open space guidelines were generally developed to provide standards for relatively large metropolitan areas. During their formulation, virtually no consideration was given to their application in rural areas with high percentages of federal lands. At the very least, their use must be cautious with a considerable number of regional qualifications. The general application of standards to the community level recreation needs must also be heavily qualified because this approach fails to consider: (1) social priorities (2) population densities.

1188 5. Sect. 2.6.2.1.1, Page 2-39 - What is meant by the term "educational transportation"?

1189 6. Table 2.6.2.2, Page 2-43 - Downhill skiing visitor days appear to be underestimated. Ski area operators, rather than U.S.F.S. R.I.M. reports should be used to accurately assess use.

1190 7. Sect. 2.6.2.1.2, Page 2-46 - Visiting Medicine Bow National Forest on one July weekend and counting licensee plates to determine residence of visitors is neither valid or accurate. There is no way this sample can be accepted as representative of visitors to this site.

1191 8. Sect. 2.6.2.1.2, Page 2-46 - The assumption that as use on the Medicine Bow increases, visitors will redistribute themselves to lesser used sites is not valid. This conclusion is based on the assumption that all sites are of equal attractiveness. In fact, sites currently showing high visitation to capacity values will probably exhibit the greatest increase in use since these are the most attractive and hence most heavily used sites.

1192 9. Sect. 2.6.2.1.3.1, Page 2-50; Sect. 3.5.2.1, Page 3-28 - Although your statements about numbers of participants at each state park within the ROI are correct, your assumptions about the similarity of recreation use across parks is erroneous. Curt Gowdy State Park is approximately 1645 acres, 285 of which are the surface area of Crystal and Granite Reservoirs. Glendo State Park by comparison is more than ten times this size. There are also major differences in numbers of facilities. When comparing impacts across sites, you are comparing apples to oranges. An increase in 20 visitor days of powerboating at Curt Gowdy State Park may have a considerably greater impact than an increase of 200 visitor days of powerboating at Glendo State Park. The impact of increased use must be discussed in the context of park capacities.

1193 10. Sect. 2.6.2.1.4.1, Page 2-52 - A one-time field investigation of park use following a major holiday is not a valid technique for estimating park use.

1194 11. Sect. 2.6.2.1.5.1, Page 2-52 - It is well documented in the research literature that conflict is not an "over-capacity condition." Rather, conflict is goal interference caused by the behavior of another user and can occur irrespective of the number of park visitors.

1195 12. Sect. 2.6.2.1.8, Page 2-62 - "Gras Reefs" should be "Gray Rocks."

1196 13. Sect. 2.6.2.1.8, Page 2-62 - Estimates of recreation use at North Crow Reservoir are based upon a sample size of 1.

1197 14. Sect. 2.6.2.2.1.2, Page 2-64 - The inclusion of 75 acres of developed ballfields when estimating parkland deficiencies is not correct. These facilities are in some instances not available to the public and in general are used by a very narrow age range. The inclusion of this acreage is arbitrary and influences the conclusion that Cheyenne has excess parkland.

1282 15. Sect. 2.6.3.1.1, Page 2-84 - We believe Figure No. 2.6.3-1C and Figure No. 2.6.3-1L should be reversed.

1198 16. Sect. 3.1.2.1.1, Page 3-8 - Suggesting that because visitation fluctuates from year to year, use projections are not necessary is incorrect. We suspect that trying to contend with visitation data from so many agencies became unwieldly, and the authors decided to rationalize their inability to integrate incompatible data.

1199 17. Sect. 3.2.1.2.1, Page 3-12 - Assumption number 2 regarding visitor use levels cannot be supported. Assumption number 3 regarding participation patterns is not valid. In fact, the authors contradict themselves on page 3-8 when they state "visitation trends tend to exhibit broad swings from year to year depending upon. . . social and demographic characteristics." Assumption number 3 is only viable if we are willing to assume that the population influx will exhibit approximately the same sociodemographic characteristics as current residents of Cheyenne. Past experience within Wyoming has shown this not to be the case. Of particular importance to recreation behavior will be shifts in age, income and household social structure. We believe this assumption is untenable yet it provides the basis upon which all recreation impact estimates are made.

1200 18. Sect. 3.5.2.1.1, Page 3-28 - By including areas outside the ACS in your gravity model, you are reducing the relative attractiveness of sites within the ACS, and therefore your model will consistently produce impact assessments lower than if you only included areas within the ACS. At the very least, estimates for both scenarios should be provided.

1201 19. Impact assessment is limited entirely to estimates of activity days produced. Law enforcement issues, squatters on state and federal lands and other management problems associated with increasing use and transient populations are never identified or discussed. This is an extremely narrow conceptualization of what constitutes "impact."

1202 20. Since the U.S.F.S. and the W.R.C. are the two regional recreation agencies most affected by this project and because both of these agencies use visitor days to estimate use, it would be more appropriate to express impacts in visitor days than in activity days.

1204 21. What is the basis for assuming that no increase in staffing will be needed to accommodate increasing use at recreation areas? Most regional recreation areas are already understaffed. Curt Gowdy State Park, for instance, only has two full-time staff positions to maintain a park with more than 67,000 visitors. Conclusions regarding staffing are not supported by the data and appear to have no basis in fact.

1203 22. Re: Gravity Model - We do not believe there is an attractiveness measure for all sites, nor is the number of alternative sites included in the gravity model. The authors cite a relatively obscure publication when documenting their model, and hence it is not really possible to verify what they have done. Also, there is no existing data which would allow for the determination of participation days at each recreation area in the model (e.g. number of Cheyenne residents visiting Medicine Bow National Forest). The quality of the reported impacts are in all likelihood inaccurate for all areas investigated. Further, if the data being used for the analysis are from the SCORP, then the authors have committed an aggregation bias by attempting to take data representative of state participation and infer characteristics to only one city in the state. This can't be done.

1205 23. Sect. 3.5.2.2.2, Page 3-9 - There is no justification given for not including Laramie, Scottsbluff, Torrington and Wheatland within the area of concentrated study for local recreation impact. Therefore, the entire report neglects the potential impact on local recreation services within these communities.

THE UNIVERSITY OF WYOMING
INSTITUTE FOR POLICY RESEARCH
AND RURAL UNIVERSITY CENTER
LARAMIE, WYOMING 82071

Memorandum

To: Paul Cleary, State Planning Coordinator's Office

From: Shelby Gerking, Institute for Policy Research

Re: Comments on Peacekeeper DEIS

Date: 14 Nov 83

Please find enclosed a set of comments on the Peacekeeper DEIS. These comments have been submitted by

1. Tom Buchanan and Larry Allen, Department of Recreation and Parks Administration
2. Harold Bergman and T.W. LaPoint, Department of Zoology and Physiology
3. Robert Brockman, Tom Wesche, Gregg Karr, and Walt Eifert, Wyoming Water Research Center
4. Shelby Gerking, Larry Ostresh, and Carl Olson, IPR, Geography, and Agricultural Economics, respectively.

The fourth set of comments listed previously were submitted in connection with the WWSIS. I hope that you find these materials to be useful.

THE UNIVERSITY OF WYOMING
INSTITUTE FOR POLICY RESEARCH
AND RURAL UNIVERSITY CENTER
LARAMIE, WYOMING 82071

Memorandum

To: Paul Cleary, State Planning Coordinator's Office

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(i) 241 In Appendix A.1, a regional input-output matrix was "guestimated" by multiplying the national matrix by a set of location quotients. While an inexpensive process, we question its validity based on the findings of Morrison and Smith (Journal of Regional Science, 1976). Reference to some articles evaluating its validity would be most helpful. Also, which region are they using for the location quotients? The seven counties defined as the Area of Site Influence or these counties plus the Denver SMSA and Larimer and Weld (mentioned on p. 2-10, Vol. 1)?

240 What are the parameters of the constrained gravity model? How did they derive them? Such parameters are notoriously variable from place to place. We certainly hope they did not simply pluck them out of the air but have no alternative than to suspect they did since the documentation is so sketchy. We are pleased that a series of sensitivity analyses were performed on their economic model...(p. A-25). Perhaps at some point they will tell us what the results were!

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To assume as a baseline that these high migration rates will continue is indefensible and will end up grossly underestimating the impact of the MX! This is the key county and the key projection variable: an error here has repercussions throughout the rest of the analysis.

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> "Other transportation elements were analyzed using basic acceptable methods." (p. A-60)

Additionally, there are several things or areas that the impact Study does not address at all or does not deal with adequately.

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In particular, more attention should be paid to impacts of the MX or Peacekeeper system on the following

986 (i) Costs of public utilities required by the project. Also, who pays for the new utility delivery system? All users or the additional users?

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-Water quantity and quality

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1449 -Also, related to recreation, is off-road vehicular travel which can be very damaging to range land and disturbing to wildlife and domestic livestock

299 -The effects of increased demand for consumer loans by the increased population due to the project on the cost and availability of lower funds for production agriculture.

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cc: Robert A. Jenkins, Vice-President for Research and Graduate Studies, University of Wyoming

Fred Hickman, Human Resources Director, URS-Berger

THE UNIVERSITY OF WYOMING 102

WYOMING WATER RESEARCH CENTER
LARAMIE, WYOMING 82071

TO: Shelby Gerking

FROM: Robert Brockmen, Tom Wesche, Greg Kerr and Walt Eifert

DATE: November 9, 1983

RE: Comments on Department of the Air Force's "Draft Environmental Planning Technical Report, Water Resources".

We have reviewed the document as you requested, and overall found it to be quite adequate, especially in light of the relatively small quantities of water the Air Force will be using under the development scenario discussed. Several comments and questions which did come up are as follows:

1356 - Our greatest concern is regarding the ability of the City of Cheyenne's water supply to meet demand during 1984 and possibly 1985 while Stage II is still in construction. While the total additional demand induced by the Air Force during these 2 years will be less than 1,000 acre feet, a supply shortage could become a reality if these are any years and/or if production from the Cheyenne well fields is less than anticipated. We would urge strong consideration of the potential mitigation measure listed on the bottom of page 3-117 calling for increased monitoring and modelling of the well field operations and the raw water supply in the Crow Creek watershed.

1355 - Many of the sources listed in Section 2 of the report for groundwater quality data are quite old (e.g., on pages 140 and 141, Rapp et al., 1953; Babcock and Bjorklund, 1956). While we are not aware of more current data, we suggest a search of the Water Center's Water Resource Data System (WRDS) be made. Along this same line, we found it somewhat hard to believe that the WRDS system was never used as a data source throughout the study (p. 2-7 and 2-8). While HATTON and STORET certainly contain a wealth of data regarding Wyoming water, many Wyoming data stored in WRDS are not available from these two sources.

1345 - There would appear to be a lack of consistency in the logic followed for estimating future Industrial and Commercial Water Use. For the City of Cheyenne, pages 3-19, the statement is made that while currently no plans are known for any new large water-consuming industries to locate there, a conservative allowance for a 100 acre-foot increase has been included. However, when considering similar

S. Gerking
11/8/83
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1345 demand increases for "Other Areas in the Region of Influence", the assumption is made that since no industrial expansions are planned, there is no need in the planning process to allow for even a moderate increase in water demand (page 3-24).

1354 Given the apparent status of Cheyenne's present wastewater treatment facilities, we would urge strong consideration be given to the potential mitigation measure listed on page 3-117 calling for early implementation of plans for upgrading these facilities.

cc: Robert A. Jenkins
Vice President of Research

103

State of Wyoming Military Department
Office of the Adjutant General
POST OFFICE BOX [illegible]
CHEYENNE, WYOMING [illegible]

AG WY (ARNG) 8 November 1983

SUBJECT: Peace Keeper in Minuteman Silos

State Planning Coordinator
Wyoming State Clearing House
2320 Capitol Avenue
Cheyenne, WY 82002

1017 In the Transportation Section page 2-59 it should read - The Army Guard operates eight UH-1H helicopters, six OH-58A helicopters, and one T42 Beechcraft Baron Twin-engine airplane.

FOR THE ADJUTANT GENERAL:

DANIEL E. NORDIN
Military Dept. State of Wyoming

104

THE STATE OF WYOMING

Aeronautics Commission

TELEPHONE 307-777 7481 200 EAST 8TH AVE CHEYENNE, WYOMING 82002

MAILING ADDRESS STATE OF WYOMING
CHEYENNE, WYOMING [illegible]

MEMORANDUM

TO: State Planning Coordinator

FROM: Wyoming Aeronautics Commission

DATE: October 5, 1983

SUBJECT: MX Impact Document Review

The following comments pertaining to the Wyoming and Nebraska Socioeconomic Impact Study are presented in the same order as the subject areas are presented in the document.

3.2.10.5.1.2 Airport Facilities

Pavement

1014 The condition of the runways should be carefully evaluated as soon as possible.

Buildings

1016 Enlargement of the waiting area in the passenger terminal at the airport will be a definite requirement.

3.2.10.5.1.3 Airspace and Navigation

Instrument Approach Aids

1068 Consideration should be given to the installation of approach radar at the Cheyenne airport. The development of RNAV approaches to runways 8 and 12 would be beneficial during low ceiling visibility conditions which occur with easterly upslope wind conditions.

During the time that the tower is not manned the approach lighting system for the ILS runway 26 is without the sequenced flashing lights which increases the visibility minimums from 1/2 to 3/4 of a mile.

State Planning Coordinator
Page Two
October 5, 1983

Air Traffic Control Tower

1068 Since increased air traffic can be expected during late evening or early morning hours it may be necessary to increase the tower operation hours from part-time to full-time operation.

Table 3.2.10-6

1065 The runway lengths for runways 16/34 and 12/30 are incorrect. The length of runway 16/34 is 4,997 feet. The length of runway 12/30 is 6,691 feet.

6.2.10.1 Baseline Description

1094 Runway 3/21 at General Brees Field in Laramie is 7,790 feet, not 9,700 feet as indicated.

Frontier Airlines uses 737's, not 727's or DC-9's, for commercial service to Denver.

Ed Herschler
Governor
105

Wyoming State Archives, Museums & Historical Department

HERBERT D. BUSH, Ph.D
Director
307-777-7611

Barrett Building, Cheyenne, WY 82002-0013

To: Dick Hartman Date: October 13, 1983

From: R. D. Bush Subject: Impact Study

I have had a chance to review the three volume Wyoming and Nebraska Socio-economic Impact Study and have been unable to find any information in that study directly impacting our agency's resources. However, for purposes of impact planning I wanted to remind you that this project will indeed directly impact the State Archives in many ways throughout its duration in that the vast amounts of paper generated by state agencies and federal government, private citizens and political subdivisions in their relationships with each other will create a vast amount of records that ultimately will find their way into the State Archives and Records Center.

771 Secondly, there will no doubt be a number of direct and indirect ways in which the statistical information provided in the Socio-economic Impact Study will be translated into areas of future impact with regard to Wyoming's history and the artifacts for the State Museum. It is quite possible that with separate guidelines and under a separate planning study these areas of future impact can be addressed at a later date. However, for purposes of planning at this particular time, I think it worthwhile that we recognize these future areas of impact and I leave it up to your judgement as to whether or not any such information in these areas ought to be included in any final environmental impact statement.

RDB:cic

Ed Herschler
Governor
106

Wyoming State
Archives, Museums & Historical Department

ROBERT D. BUSH Ph.D
Director

Barrett Building, Cheyenne, WY 82002-0013

To: Dick Bartman

Date: November 16, 1983

From: Robert D. Bush

Subject: MX Missile Impact

584 Enclosed are reports from the three divisions of our agency concerning their assessment of the preliminary impact of the Peacekeeper Missile Project. I have enclosed their reports to me verbatim in order that should you or anyone in your office have questions, they could refer them directly to the persons preparing the individual reports. While all three divisions have addressed those areas which they feel would impact their responsibilities, I would like to call your attention particularly to that prepared by the Archives, Records Management and Centralized Microfilm Division. This is because the impact will be much more direct and long lasting in their division than in the other two. Keep in mind that all of the paper generated by this project within the state of Wyoming for state government and political subdivisions is by statute going to become part of the archives responsibilities at some point. While many agencies are at present facing the problems of cutbacks in our economy and activities, our agency and in particular this division within the agency, are still dealing with the "boom" of five to ten years ago in the form of all of the records and paper that was generated at that time.

2 We will be happy to provide any additional information which your office may require in attempting to meet the environmental impact of the Peacekeeper in Wyoming.

RDB:clo

Enclosures

107

Ed Herschler
Governor

Wyoming State
Archives, Museums & Historical Department

ROBERT D. BUSH Ph.D
Director

Barrett Building, Cheyenne, WY 82002

November 9, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Dear State Planning Coordinator:

Thank you for giving us the opportunity to comment on the cultural resource section of the Draft Environmental Impact Section of the MX Missile being placed in Minuteman Silos.

1256 In section 3.1.12-c, the report states "It is assumed that the Air Force will establish a program for resource management that complies with applicable federal and state laws and regulations." The Air Force should survey all the areas which will be affected by this undertaking for all cultural resources. The Air Force should also evaluate the resources for National Register of Historic Places eligibility and mitigate any adverse impacts to Register-eligible resources as is described in section 3.1.12 A. Once this is accomplished we will then be able to comment in more detail.

Sincerely,

Rick Ewig
Research and Oral History Supervisor

RE:ra

Enclosure

cc: Robert Bush

108

Department of the Air Force
Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos
90th Strategic Missile Wing
F. E. Warren Air Force Base

October, 1983

584 3.1.12 Cultural and Paleontological Resources

Four major elements are included in this section of the Statement, prehistoric cultural resources, historic cultural resources, American Indian resources, and paleontological resources. The region of influence considered by the Statement, within Wyoming, includes all of Albany, Goshen, Laramie and Platte counties.

The four elements studied and discussed in this section are not within the statutory functions of the Archives, Records Management and Centralized Microfilm Division, nor is the Division's expertise centered in any of these four elements. For the Division to comment in more than generalities on any of these elements would be presumptuous, since expertise for these elements of the Statement is centered in the other Divisions of the Archives, Museums and Historical Department.

Not addressed by this environmental impact statement is a hidden impact and a costly one. The infusion of new workers and population, a projected in-migration of 4,811 people by 1987, will have a striking effect upon the number of public records created by local governments and special districts, by county governments, and by some state government agencies. In addition to the in-migration resulting from the deployment of the Peacekeeper, the National Planning Association projects an annual employment increase in Wyoming of 2.7 percent from 1980 to the year 2000. This will amount to more than 7000 new jobs annually. The great majority of these new jobs will bring new people to the state.

For every new resident, records of various types and at different branches and levels of government result. The volume of land and deed records, drivers licenses and automobile registrations, tax and assessment records, court and workers compensation records, social services and school records, and employment security and corporate records, to name a few, all increase dramatically with significant growth

584 in population, even a few thousand people. This new surge of records impacts local, county and state government units, and, because of its statutory responsibilities for all public records in Wyoming, the Archives, Records Management and Centralized Microfilm Division.

To efficiently manage this records impact resulting from new residents, a necessity if the new citizens of the state are to effectively receive governmental services, new resources will be essential. More resources in terms of storage area, personnel, supplies and equipment will be needed, not only by local and state government agencies providing services, but by the Archives and Records Division, if the Division is to assist local governments and state agencies in the management of records and information as required by law.

Prepared by: Jim Donahue, 11/10/83

109

Ed Herschler
Governor

Wyoming State
Archives, Museums & Historical Department

ROBERT D. BUSH, Ph.D
Director

Barrett Building, Cheyenne, WY 82002-0013

To: Dr. Robert Bush, Director, AMH Department

Date: October 21, 1983

From: Mike Mayfield; Division Head Museums and Historic Sites

Subject: Draft Environmental Impact Statement

Suggest that this report be also reviewed for recommendations to your office by the other two divisions.

Recommendations from the Division of Museums and Historic Sites are:

1. Based on present museum collections and research information recorded within our division, the report presents an adequate assessment of prehistoric, historic, paleontologic, and American Indian sites or cultural areas within the Region of Influence. 1

2. Table 2.1.12-1 of this report, entitled "Recorded Prehistoric Sites in the Region of Influence", indicates about 1500 archaeological sites have been reported within the impact area. However, the report's statement (p.p. 2-74, 2-76) that "it is likely, however, that the observed intercounty differences reflect variability in the extent of prior inventory work in these same areas rather than actual densities of prehistoric sites" should be emphasized. 1255

This observation should also be applied to historical and to paleontological sites.

MEM:mn

Enclosure
(Draft Environmental Impact Statement)

110

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

In reply refer to

Attorney General

A.G. McCLINTOCK
ATTORNEY GENERAL

CHEYENNE, WYOMING 82002
PHONE 307-777-7841

October 12, 1983

MEMORANDUM

TO: Richard Hartman
State Planning Coordinator

FROM: Lawrence J. Wolfe
Senior Assistant Attorney General

Marion Yoder
Assistant Attorney General

RE: MX Peacekeeper Socioeconomic Impact Study

We have skimmed all three volumes of this work and briefly discussed it with our client agencies. Our initial reaction is that the data gathered is so general and inspecific as to be of little value in making a useful socioeconomic assessment of predicted impact.

For example, the section describing the Laramie County Court consists of a few paragraphs and a chart, 3-59 to 3-61. The report states that there is a significant backlog of cases and that County Court is presently now working at capacity. The conclusion is that "any increase in caseload would be reflected in a further rising increase in backlog". 679

Some rough figures estimating the number of additional judges, staff and space are given, although no true current showing the amount of new cases that may be expected are supplied. Rather, similar trends are drawn as to the expected increase in unemployed persons and assault arrests and the concomitant increase in need and attributable increases in these groups. However, no hard figures are supplied, and instead, some six pages [illegible] for absorbing this undefined impact are lumped "for consideration" with no preference. 674 676

The same [illegible] the description of the [illegible] description of which [illegible] Attorney's office, [illegible] 684 683

Page 2
Lawrence J. Wolfe
October 12, 1983

We could find no mention of the District Court systems in Laramie, Platte, Goshen or Albany Counties. The report does briefly touch on the District Court systems in the affected Nebraska counties; 7-7, 8-7, 9-5. It appears that the report writers did not understand that Wyoming has a District Court system. 667 663 664 662

There are other inaccuracies in the report, as well. Under the section on solid waste disposal in Cheyenne, 3-70, a very optimistic description of the present dump's capacity and future is given. It is acknowledged that "...the operating permit application for the site is being processed by the Wyoming Department of Environmental Quality. Issues to be resolved include modification of the existing landfill's operating procedures and evaluation of groundwater contamination potential." This is a very misleading description of a problem related to the fact that the present dump site may pose a threat of groundwater contamination. 924

Under the "Toxic and Hazardous Wastes" Section, 3-71, the report simply claims that "private firms collect and recycle or dispose safely at existing permitted sites" toxic substances generated in Cheyenne. We know of no such private firms or of any permitted site for this kind of commercial dumping within this area, though there is one in Denver, which is used primarily by the military here. This is not to say dumping does not occur here; however, it is not sanctioned by the Department of Environmental Quality. 934

The report also misstates the present capacity of the Cheyenne Safe House, and gives incorrect figures on staff size, the number of volunteer hours donated annually, and the percentage of unemployed Safe House residents. One of our attorneys is on its Board of Directors. Some of the information given in the report is accurate, including the fact that the Safe House is filled to capacity (9 to 15 residents) 47% of the time now. Although the expected increase in population will undoubtedly increase Safe House demand, the report states (without supporting data) that one additional staff member will be able to absorb the increase in caseload predicted by 1985. The report implies that it is impossible to accurately predict the impact. However, the literature is filled with statistics on the average age of abusive spouses, the number of abusive military personnel, the growing trend toward violence in spousal relationships and other data. A little work would have provided some very telling figures as to what could be expected from the MX impact. 762

LJW:MY:sd

111

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

In reply refer to

Attorney General

A.G. McCLINTOCK
ATTORNEY GENERAL

CHEYENNE, WYOMING 82002
PHONE 307-777-7841

November 26, 1983

TO: Richard Hartman
State Planning Coordinator

FROM: Lawrence J. Wolfe
Senior Assistant Attorney General

John D. Erdmann
Assistant Attorney General

RE: Comments on Draft Peacekeeper EIS

Water Supply For Cheyenne Area

Statement at p. 3-226 and following discussion (See also p. 2-98):

"One alternative for increasing water supply in Cheyenne is to lease or purchase existing rights."

Statement at p. S-16:

"Potential mitigation measures to reduce this short-term water supply impact could be, among others, the implementation of water conservation measures or purchase of water rights in the Crow Creek watershed to provide additional water to the Cheyenne urban area."

Reliance on the possibilities of purchasing or leasing water rights in the Crow Creek watershed is not realistic. Change of use proceedings before the State Board of Control reduce the amount of water available for transfer to only the beneficial consumptive use which can be documented and proved for at least the previous five years. Conveyance losses are charged as can be computed for changes in point of diversion and means of conveyance. Typically, the [illegible] amount is a small [illegible] 202

...centage of the water rights [illegible] ... cannot be demonstrated. The result is left to the judicial pattern of [illegible] ... seasonal ... diversions.

202 The leasing procedures [illegible] by the State Engineer are not widely used to acquire large amounts of water. The right being leased must not be used during the applicable time period nor to exceed that [illegible] in order to make the water available to the substitute use. The typical situation has involved short term, small scale water needs for construction activities and mineral exploration. Most ranch and farm operations cannot afford to lease any part of their water and remain viable over long periods of time.

The water rights statutes for purchase or lease are not particularized and the administrative problems regarding transfer of substitute use are not discussed. A realistic analysis would reveal that not much water is available for purchase or lease and that the administrative problems pose serious obstacles.

1304 As to the increased water supplies that will eventually be made available by the State Engineer, the draft EIS does not make clear that the additional [illegible] ... pipeline must be constructed before the full advantage of the project can be realized.

1333 And as to the increased supplies to be developed from the [illegible] ... should be noted that the [illegible] ... analysis ... has not used [illegible] sealant material. Leachate from the [illegible] ... details and other contaminates [illegible] ... wells these wells [illegible] ... use. Because of possible health [illegible]

Impacts to Private Landowners

See Statement beginning at p. [illegible]

157 [illegible] ... the [illegible] ... [illegible] ... [illegible] ...

Frontier Conservation District

P.O. Box 971 Cheyenne, Wyoming 82001

March 13, 1983

Gordon Fornell, B.Gen., USAF
Special Assistant for Peacekeeper
DCS/Research, Development & Acquisition
HQ USAF/RDR-M
Washington, DC 20330

Dear General Fornell:

Thank you for your February 18 letter. Our initial concern was that a soil survey should be completed on the 2 or 3 potential MX sites before a final siting decision was made. The soil survey would have provided critical information to assist you in preparing the draft EIS and the site selections. It has become obvious that because your time frame requires a draft EIS this spring and soil survey work could not begin until this summer, our initial request that a soil survey be completed is unrealistic.

In addition to our conservation district's responsibilities in agricultural areas, we also have a major role in assisting the city-county planning commission in their sub-division planning process. We provide information concerning soil suitability for construction of buildings and roads, erosion potential on construction sites, and soil suitability for septic systems. In addition, we often recommend mitigation measures or erosion control practices if a potential problem exists. Without a soil survey of potential new sub-divisions it is very difficult to provide this information in an accurate and timely fashion.

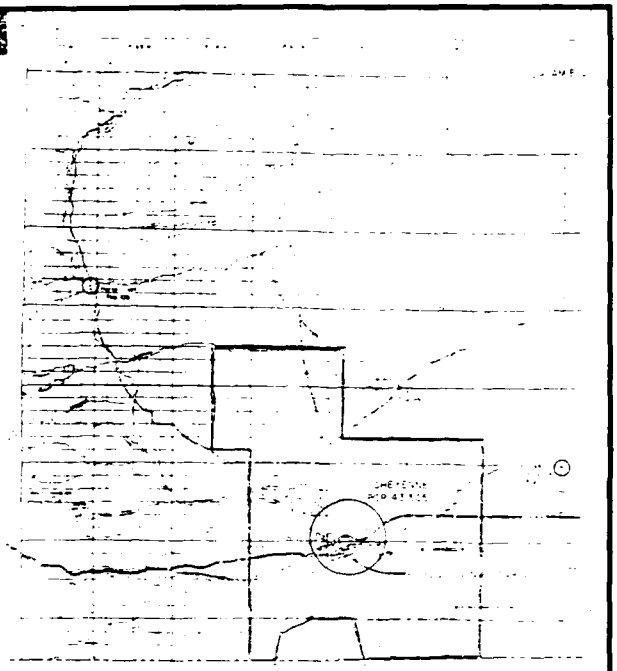
We believe that the Air Force has a responsibility to assist the local area in planning for the impact which is inevitable if either basing mode is adopted in Cheyenne. In light of this responsibility, we are requesting that the Air Force provide funds either to the State, the County or our Conservation District so that an order 3 soil survey can be completed in the area surrounding Cheyenne. We have delineated the areas we believe should be surveyed on the enclosed map. It is our understanding that the USDA Soil Conservation Service office in Casper, Wyoming has presented a complete proposal to Kevin Carrol, Norton AFB, California.

Sincerely,

[illegible] Secretary
[illegible] Conservation District

[illegible] Interest [illegible] Soil [illegible] USAF, Regional Civil Engineer - MX, AFESC/[illegible]
[illegible] Air Force Base, CA 92409
[illegible] Governor's Office, Cal Nicholson, HQ BMO/DS
[illegible] Montross, HQ USAF/RDR-M, [illegible] Wyo. Geological Survey, Commissioner
Frank Dickson, SCS State Conservationist
Keith Schoene, [illegible] Laramie County Conservation District
George Hartman, SCS, Casper

Enclosure



ORDERS 2 AND 3
2. Consociation, Association & Complex, MINIMUM Size Delineation, 1.5 ac - 10 Acres
3. Association & Some Consociation & Complex, MINIMUM Size Delineation 6-640 Acres

United States Department of Agriculture — Soil Conservation Service

P. O. Box 2440
Casper, Wy. 82602
March 9, 1983

Mr. Kevin M. Carrol
AFRCE-BMS/DEVPC
Norton Air Force Base
California 92409

Dear Mr. Carrol

Attached, as you requested at the Soil Conservation Society of America meeting in Casper, is a proposal for completing a soil survey of the Peacekeeper missile location. While the figures in the proposal are not exact, they should not vary more than 10 percent. If we were to map the area for the Air Force, we would have to charge the actual cost rather than a bid price.

The Soil Conservation Service is very concerned that a soil survey is not available for a project of this magnitude. We would make every effort to expedite a soil survey by detailing over one-half of our soil science staff to the project should the Air Force elect to use a soil survey in developing the site. By drawing soil scientists from all over the state to accelerate the soil survey we should be able to complete about 215,000 acres in and around the project area in 60 to 70 days. This is assuming that about one-third of the area would be mapped in detail (order 2) and about two-thirds slightly more broadly (order 3). The order 2 area would be suitable for use in detailed planning of building sites, roads, streets, etc. while the order 3 would be useful for broad planning such as the determination of wildlife habitat. This would include the time needed to write a report on the project.

If you have a need for any further information, please give me or George Hartman a call at 307-261-5201.

Sincerely,

Frank S. Dickson
State Conservationist

cc: Paul M. Howard
Ralph J. McCracken
Galen S. Bridge

Attachment

The Soil Conservation Service is an agency of the Department of Agriculture

MX PEACEKEEPER SOIL SURVEY
Laramie County, Wyoming

Should the Pentagon elect to have a soil survey on the proposed area and assuming the project involves 215,000 acres, the following are some of the factors to be considered:

1. Office space - would need some temporary quarters, and storage space for vehicles would have to be arranged. A trailer located near the project area would be one possibility. Space at Warren Air Force Base would be another. Private space or trailer = $2,000.

2. About the earliest the project could start would be mid-May. Field work would be complete around July 15. Copies of field sheets should be available in 25 days. It might be possible to have the Air Force make copies of the field sheets in their photo labs.

3. Cooperative relations - The possibility of having either Soil Conservationist in Cheyenne or Air Force personnel make contact with landowners prior to field mapping might save some time.

4. Costs

A. Salary costs for mappers

George Hartman, Party Leader - 240 hours	
Abe Stevenson, Assistant Party Leader - 200 hours	
Paul Shields, Party Member - 200 hours	
Susan Arnold, Party Member - 200 hours	
Marvin Suhr, Party Member - 200 hours	
Halvor Ravenholt, Assistant Party Leader - 200 hours	
Larry Malnor, Party Member - 200 hours	
Ann Pullen, Party Member - 200 hours	
Chris Garcia, Party Member - 200 hours	
Robert Baumgartner, Range Conservationist - 160 hours	
Subtotal	$35,356

B. Supporting cost

(1) Two progress reviews conducted by Phillip Darr - 80 hours
(2) Manuscript assistance by Ruth Larsen - 120 hours
(3) Interpretations assistance by Jack Young - 80 hours
(4) Public relations - Landowner contact by Don Heyne - 40 hours
(5) Supervision, flag sticks, etc. by Garen Sanders - 40 hours

Subtotal [illegible]

C. Travel

58 weeks of per diem	$10,021
Mileage for vehicles	1,972
Subtotal	$11,813

D. Publication costs:

(1) Map costs:		
(a) Cartographics	$ 400	
(b) Art work		
(c) Proof prints		
(d) Labor	1,800	
(e) Typesetting (Laser Graphics)	1,800	
	Subtotal	$ 4,000
(2) Text: 100 copies of 70 pages of 3 grams, tables, and pictures		$ 5,000
E. Miscellaneous:		
Chemicals, augers, shovels, repairs, etc		$ 700
	Grand Total	$10,174

I assume the work would be done by a private printer.

Time Table of Events

Day 1 - Meeting with Air Force officials to determine extent and purpose of survey.

Day 1 - 5 - Initial reconnaissance of survey area by Hartman, Heyne, Stevenson, and Air Force official. Air Force or SCS District Conservation staff contacts landowners for permission to enter.

Day 5 - 10 - Initial review - Hartman, Derr, Stevenson, and Baumgartner.

Day 10 - Crew arrives and begins mapping. Range assistance is given by Baumgartner.

Day 15 - Draft descriptions of all map units given to Larsen for incorporating in the word processor. Mapping continues until day 25.

Day 16 - 17 - Classification and correlation assistance - Derr, Hartman, Stevenson, Baumgartner, and Ravenholt. Initial review drafts of range descriptions are written in the field and given to Derr for incorporating in the word processor.

Day 18 - 19 - Meeting with Young to develop initial tables and new SCS-6's - Hartman, Ravenholt, Stevenson, and Baumgartner.

Day 22 - 25 - Final field review - All staff members conducted by Derr. Tables ordered by Young. Final edit of descriptive legend by Larsen.

Day 25 - 26 - Field sheets edited by entire staff and sent to printing contractor. Crew leaves and returns home. Edit of manuscript begins. Table order is sent in via Harris terminal.

Day 35 - Edit of manuscript is complete and sent to contractor for printing. Table order is received and edit begins.

Day 40 - Tables are edited and sent to printer.

Day 45 - Printed map and tables and text are received from printer and final edit begins.

Day 50 - Edit complete and returned to contractor.

Day 60 - Published report received and presented to Air Force personnel.

Summary

Field work should be completed in 25 days. Finalized of material should be completed in 50 days. Published report should be completed in 60 days.

Mapping rate = 600 acres/day/person

113

THE STATE OF WYOMING

EDWARD HERSCHLER
GOVERNOR

Department of Administration and Fiscal Control

Research and Statistics Division

October 7, 1983

TO: Paul Cleary, State Planning Coordinator's Office

FROM: Steve Furtney, Research and Statistics Division

SUBJECT: DEIS, Relocation of Minuteman Missile Fields

The Draft Environmental Impact Statement for the Deployment of Minuteman Missiles, Wyoming and Nebraska, seems to be a carefully written document and adequately addresses impact areas. My comments will be directed primarily to those areas where I feel additional information is needed. Therefore, I will not comment on the adequacy of the remaining sections.

250 The baseline growth projections for Albany, Laramie, Converse, Niobrara and Platte are high in our opinion.

253 The baseline projections for communities should not be the same as the baseline growth projections for the counties.

274 The baseline assumptions may result in a overestimate of population growth caused by development of the MX, which is currently receiving much attention.

249 The use of several categories which is relatively important has not been adequately documented for purposes of determining the validity of the methodology of derivation of these factors. In fact, the discussion is more sketchy on the presentation of migrant population characteristics than ANSTO. The historical migrant statistics which have been excluded. Presentation of these rates on a county by county basis would be very useful for comparing to the baseline projected growth, most of which will result from migration to the area.

114

THE STATE OF WYOMING

EDWARD HERSCHLER
GOVERNOR

Department of Administration and Fiscal Control

Research and Statistics Division

October 7, 1983

TO: Paul Cleary, State Planning Coordinator's Office

FROM: Steve Furtney, Research and Statistics Division

SUBJECT: Wyoming and Nebraska Socio-Economic Impact Study

Sections 2.3.1 and 2.3.2

Baseline growth rates exceeding 3 percent per year for Goshen and Platte counties seem unfounded since these counties have not experienced such growth since the 1930's and have actually experienced declines with the exception of Platte County and the Missouri Basin Power Project during the 70's. An average annual rate in excess of 2 percent in Albany and Laramie counties is not out of line with historical patterns for the last several decades, but it should be remembered that the population bases have grown and we are talking about larger and larger absolute population changes in order to maintain such growth rates.

250 The average annual growth figures which result from projections which we have made through 1993 in our Population and Employment Forecast of July 1983 work out to be as follows: Albany 1.52 persons per year, 1.09 percent per year, Laramie 1.76 persons per year and Platte 0.6 percent per year. This is based on the thirteen year period from 1980 to 1993.

253 Therefore we feel the baseline projections for the Wyoming counties in this study are high and do not reflect the current reasonable being established by the State of Wyoming.

The baseline projections for the communities in Table 2.3.3-4 do not have sums given the county baseline projections of Table 2.3.3-3. These figures appear to be totally inconsistent. For example between 1981 and 1987 Albany County is projected to grow by 8,307 (32,823-25,516) but the city of Laramie is only projected to grow by 1,333 (26,173-24,840). Where is the rest of the projected population going to reside within Albany County? Similar discrepancies exist between these two tables for all Wyoming counties and the respective cities within these counties.

Whether these baseline projections are critical or not depends on how the impact figures are computed. If the impact figures are computed independently, regardless of the baseline population, and are added to the baseline figures to derive the MX impacted population figures, then the baseline figures are not as critical. However if the impact is being computed as the difference between two independent model runs, one with the MX and a separate baseline run without the MX, then a high set of baseline projections will underestimate the impact caused by MX. It appears that the impact is being figured and added to the baseline projections. If this is the case then the remaining problem with a high baseline is that it implies certain mitigative measures are going to have to be undertaken whether or not the MX comes in, and this reduces the "impact" seemingly caused by the MX in terms of capital facilities needs.

274

Appendix A1, Page A-27

The Study discusses the use of several categorical factors relating to immigrants, but does not discuss how these particular factor values were derived. Therefore it is hard to judge their validity.

272

Appendix A2, A-28 and Table A.2-16

The Study discusses historical migration rates at the county level and provides the figures in Table A.2-16. However there is only a table for Albany County and not for any of the rest of the counties. This is a critical exclusion in evaluating the baseline projected population growth since migration generally accounts for a majority of the volatility in population change. In reviewing what is presented for Albany County, the migration figures between the 1970 and 1980 censuses do not justify an average annual growth rate of 2 percent per year over the projection period. In fact the majority of the change in Albany County between 1970 and 1980 is due to births and deaths and consequently the projected figures should coincide with figures based on projected birth and death rates. If this is not the primary criteria for justifying a 2 percent average annual growth rate, then the authors of this study have not provided any justification for their projected growth rate and they need to provide some kind of explanation. We also need to see the comparable tables to A.2-16 for the remaining Wyoming counties.

249

251

THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

Wyoming Department of Agriculture

TELEPHONE (307) 777-7321 — CHEYENNE WYOMING 82002

JOHN DAYTON, COMMISSIONER

BOARD MEMBERS
WILLARD GOWER, CASPER, PRESIDENT
JAMES H. MAGAGNA, ROCK SPRINGS, VICE PRESIDENT
DON OLSON, KINGSTON
JOHN RANSTROM, GRAND CREEK
RUTH RICE, DAYSTON
ED HERSCHLER, GOVERNOR
DR. THOMAS DUREN, ACTING DEAN, COLLEGE OF AGRICULTURE, UNIVERSITY OF WYOMING, LARAMIE

DATE: November 17, 1983

TO: Warren White
State Planning Coordinators Office

FROM: Don Daiss, Assistant Commissioner
Department of Agriculture

SUBJECT: COMMENTS ON PEACEKEEPER DRAFT ENVIRONMENTAL IMPACT STATEMENT

The attached comments have been received from Collin Fallat, Director of the Division of Agriculture Planning and Development and reflects the views of the Wyoming Department of Agriculture.

Thank you for the opportunity to comment on this matter.

ls

attachment

"AGRICULTURE—the backbone of Wyoming"

THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

Wyoming Department of Agriculture

TELEPHONE (307) 777-7321 — CHEYENNE WYOMING 82002

JOHN DAYTON, COMMISSIONER

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RUTH RICE, DAYSTON
ED HERSCHLER, GOVERNOR
DR. THOMAS DUREN, ACTING DEAN, COLLEGE OF AGRICULTURE, UNIVERSITY OF WYOMING, LARAMIE

DATE: November 17, 1983

TO: Don Daiss,
Assistant Commissioner

FROM: Collin Fallat

SUBJECT: PEACEKEEPER DRAFT ENVIRONMENTAL IMPACT STATEMENT

This memorandum presents the Division of Agriculture Planning and Development's comments on the Peacekeeper Draft Environmental Impact Statement.

Page 3-181 - Rural Land Use

The EIS states that nine existing inhabited structures fall within a restrictive easement. The landowners affected will be paid for their homes should they choose the option of moving out of the restrictive zone. Should the landowners choose to vacate their residence the Air Force will pay fair market value for the residence and the reduction in value of the residential property. It is the position of the division that landowners should be paid replacement value for their residential property. Given today's real estate market, an individual can not replace any home for the same cost as the real market value received for an older home. Those individuals who choose to vacate their homes will suffer financial loss if not provided additional compensation for a replacement residence. This impact has not been adequately analyzed in the EIS and needs further evaluation and consideration related to the affected homeowners situation.

192

Page 3-181 - Rural Land Use

The EIS recognizes that potential interference will occur with the cultivation and harvesting of irrigated and dryland crops. The EIS does not address compensation to the landowner for right-of-way, access or damages to crops and rangeland during and after construction. The final EIS should clearly address the issue of compensation to affected rural landowners.

114

The EIS gives limited attention to reclamation plans and methodology related to reclaiming lands disturbed by trenching. The final EIS should present a basic reclamation plan for consideration by landowners, the affected conservation districts and the Soil Conservation Service.

1139

"AGRICULTURE—the backbone of Wyoming"

Don Daiss - EIS Comments - MX
November 17, 1983

Page 3 185 and 3-186 - Mitigation

The division supports mitigation measures outlined for lessening impacts on rural land use.

1131

Page 3 186 - Unavoidable Adverse Impacts

The statement is made that there are no unavoidable adverse impacts on urban or rural land use. The statement should read "there are unavoidable adverse impacts on urban or rural land use." The fact remains that there are long and short term unavoidable adverse impacts on rural land use. The statement is misleading and should be changed.

1132

ls

116

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Economic Planning and Development

BARRETT BUILDING CHEYENNE, WYOMING 82002

JOHN NILAND
EXECUTIVE DIRECTOR

MEMORANDUM

TO: Ann Redman
FROM: Steve Achter
DATE: November 17, 1983
SUBJ: #82-149 - MX Draft EIS

Because of the comprehensive nature of the DEIS, I have decided to limit my comments to the area of land use.

Section 2.1.10.1.1.1 Cheyenne, Wyoming

1115 In the first paragraph three critera are used to determine the capacity of urban areas to absorb growth in an orderly fashion. The authors apparently have forgotten that the availability and location of water and sewer is also a determining factor in urban development.

Section 3.1.10.2 Definition of Levels of Impact

1116 This sections classifies levels of impact as negligible, low, moderate and high according to specific definitions. It is the specific definitions which I feel are totally inadequate. Using these definitions if development controls have been adopted (it does not say what controls) impact will be classified as either negligible or low. There can apparently be considerable change in the character of the land and area or the change can be inconsistant with adopted plans and according to the definitions, the impact is negligible or low. I suggest the definitions be changed to relate to how the character of the land and area is affected and how proposed actions relate to adopted plans.

Section 3.1.10.4.2.1 Urban Land Use

1117 The DEIS always talks about sufficient vacant land as if not realizing the time frame involved in the development process. To portray a more accurate picture, the availability of land should be expressed in more precise forms. For example, if all that is required to use a site is a building permit because the land is subdivided and properly zoned, then construction time is the only lead time that has to be considered. However, if the land is not subdivided or properly zoned, the time frame is greatly expanded.

Section 3.1.10.6 Mitigation Measures

1135 What are standard assumed Air Force mitigations? They should explain
1118 what these are. It is also stated in this section that each measure identifies the party responsible to implement, but the first measure listed does not do this.

SA:jc

117

MEMORANDUM

TO: Randolph Wood, Administrator, Air Quality Division

THROUGH: Charles A. Collins, Air Quality Supervisor
Eckart Haas, Air Quality Engineer

FROM: Cathy Rhodes, Air Quality Associate Engineer

SUBJECT: Peacekeeper in Minuteman Silos Draft Environmental Impact Statement

DATE: November 2, 1983

The draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos and the supplemental Draft Environmental Planning Technical Report address the impacts of the project and possible mitigation measures.

Carbon Monoxide and fugitive dust are the only pollutants expected to have large increases in emission quantities. The emissions will result from construction of new buildings and roadways on F.E. Warren Air Force Base, construction of project induced housing, upgrading of unpaved deployment area roads, installation of communications cables, and modification of launch facility access roads and site pads.

The air pollution models used in the emissions analysis were CALINE 3, MOBILE 2, CRSTER, ISC-Short Term, and CDM-Wyoming. Table 3.5-1 shows the predicted CO concentrations at selected intersections and roadway segments in Cheyenne. The maximum 24 hour fugitive dust concentrations, as predicted by ISC, are shown in the following table.

MAXIMUM 24 HOUR FUGITIVE DUST CONCENTRATIONS

1483

Activity Site	Concentration (ug/m^3)	Distance From Source (m)
F.E. Warren AFB	47	100
Residential Development	42.9	100
Deployment Area	34	100
Communications Cables	18	100
Launch Facility	48	100

Results of CDM are contained in Tables 3.5-1 and 3.5-2. No state ambient air quality standards are equalled or exceeded for carbon monoxide or total suspended particulates.

Additional emissions will result from immigrant population activities and an increase in the use of the central heating plant at F.E. Warren Air Force Base. Table D.6-1 lists the predicted total short-term emissions for all years of construction activity.

The project passed the level-1 visibility screening analysis, therefore visibility impairment in a Class I/Category I area is not likely to occur.

-2-

1483 The fugitive dust emissions analysis assumes chemical treatment of exposed land area, unpaved roadways, and storage piles. The following additional mitigation measures are proposed in the DEIS.

Use of tarp and/or revegetation of disturbed surfaces.

Speed restrictions for vehicles traveling on unpaved roads.

Paving of roads as early in the project life as practical.

Establishment of an emissions control program to ensure that emissions levels comply with regulations, including an inspection and maintenance program for construction vehicles.

None, some or all of these additional measures may ultimately be utilized.

118

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

LAND QUALITY DIVISION

401 WEST 19TH STREET TELEPHONE 307 777 7756 CHEYENNE WYOMING 82002

September 26, 1983

MEMORANDUM

TO: Robert Sundin, Director

FROM: Gary Beach, Mine Reclamation Programs Manager

SUBJECT: Wyoming-Nebraska Socioeconomic Impact Study for the Peacekeeper

454 I have reviewed the above referenced impact study. As noted, this statement is limited to socioeconomic impacts. It does not address any impacts to the environment. From the activities described, this Division would only have concern with the impacts that may be associated with obtaining aggregate (materials) for concrete products and road surfacing, stone and clay products derived from mining and quarrying (see Table 2.1.2-1). None of the impacts associated with the obtaining of these construction materials are described.

GB:klr

119

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

LAND QUALITY DIVISION

401 WEST 19TH STREET — TELEPHONE 307 777 7756 — CHEYENNE WYOMING 82002

MEMORANDUM

TO: Robert Sundin, Director

FROM: Dennis Framsway, Principal Environmental Analyst

DATE: October 24, 1983

SUBJECT: Review of EIS, M-X Missle System

A review of the M-X Missle EIS has been conducted in regards to permitting impacts to the Division and associated environmental impacts. The following comments are offered:

1. The U.S. Air Force currently estimates the need for 1,097,131 tons of aggregate for construction purposes over a five year period. Although the source of this aggregate has not yet been identified (contracts have not been awarded), an evaluation of 10 current quarrys and sand and gravel operations in the Wyoming counties of Laramie, Platte, and Goshen indicate that this volume of aggregate can be met. This conclusion is based on present production levels which total approximately 1,855,000 tons/year. If these operations expand the Division can expect an increase in permitting work, however, an accurate evaluation of the amount can not be made until contracts are awarded. **1**

2. The environmental impacts of the increased mining will probably be insignificant depending on specific site conditions. It is expected that reclamation standards will be met by the operations.

3. Cement and ballast needs amount to 6,395 tons and 415 tons, respectively. These volumes of materials can easily be met by Wyoming operations with minimal increase in current production levels.

4. Coal use for electrical generation for the project and afterwards will also be minimal and should not result in an increased workload to the Division.

DF:lg

120

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

Water Quality Division

1111 EAST LINCOLNWAY — CHEYENNE, WYOMING 82002 — TELEPHONE 307 777 7781

MEMORANDUM

TO: Robert E. Sundin, Director
Department of Environmental Quality

FROM: LeRoy C. Feusner, P.E.
Southeast District Supervisor

DATE: November 4, 1983

SUBJECT: Water Quality Division Review Comments of *Draft EIS for Peacekeeper in Minuteman Silos*

The Water Quality Division has reviewed the Draft EIS for Peacekeeper in Minuteman Silos and have the following comments concerning the document.

46 1) The Draft EIS presents an overall good presentation of the proposed project in general terms. The technical data to support conclusions contained in the Draft EIS can be found in any one of the several technical reports prepared for the project. We have copies of the support technical reports concerning utilities (water, wastewater, hazardous wastes, etc.) and water resources (surface and groundwater impacts) for any future use by the Department of Environmental Quality personnel.

169 2) Section 1.6.10.5 Radiation and Toxic Sugstance, page 1-34 and Section 1.6.10.6 Hazardous Wastes, page 1-35. These sections present a general discussion concerning the kinds of hazardous wastes or toxic substances which might be generated during construction and operation of this weapon system. The Water Quality Division has recently learned that an existing wastewater pond constructed several years ago, but not presently being used, located in the Weapons Storage Area (WSA) of F.E. Warren AFB, may be considered for use in either storing or treating liquid wastes (MMH or N_2O_4) from the missile system. Prior to receiving any liquid wastes from any source, Air Force officials will be required to discuss this issue with the Water Quality Division and obtain all necessary permits to ensure that waters of the State are adequately protected. If the existing pond is not adequate, Air Force personnel should understand that construction work may be required to provide the necessary protection. A permit to construct from the Division would be required prior to initiation of any modifications. Procedures for obtaining the permit are outlined in Chapter III, Wyoming Water Quality Rules and Regulations.

170 3) Section 1.6.10.7 Air Force Contingency Plans, pages 1-35 and 1-36. This section concerns general Air Force reponse actions in the unlikely event of a discharge of oil or hazardous substance which would either threaten or enter waters of the State. One subsection in that discussion indicates the membership of a base disaster control group. One member of such a group would be a military bioenvironmental engineer at the base. At the present time, no bioenvironmental engineer is assigned F.E. Warren AFB. It has been our experience that all coodination with this Division has been accomplished through a bioenvironmental engineer. For this reason, it is suggested a senior bioenvironmental engineer and technician be assigned to the military contingency on the base which will directly monitoring the construction phase of this project. This would assist the Water Quality Division by providing one central environmental quality contact person who would be knowledgeable on daily activities associated with this project.

847 4) Section 3.1.7.4.2 Wastewater, Cheyenne Urban Area, paragraph 2, page 3-130. The Construction Grants Section of the Water Quality Division indicates that only limited federal 201 Facilities Plan monies will be released for FY 84. The majority of federal funding for the Cheyenne Urban Area 201 Plan will be available in FY 85, provided no Congressional delays are incurred.

852 5) Section 3.1.7.4.2 Wastewater, Torrington, Wyoming. Page 3-130. The Water Quality Division is not aware of any formal City of Torrington *201 Facilities Plan*. A limited survey of needs study may be in progress, but a reference to a Section 201 (Clean Water Act) study should be deleted.

121

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

Water Quality Division

1111 EAST LINCOLNWAY — CHEYENNE, WYOMING 82002 — TELEPHONE 307 777 7781

October 12, 1983

State Planning Coordinator's Office
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Re: Water Quality Division Comments of the Peacekeeper Missile Deployment Socio-economic Impact Study, September, 1983

Gentlemen:

The Water Quality Division has completed a review of the referenced documents, and would respond with the following comments

262 Page 2-10, Section 2.2.1.1 Baseline Description. Employment and unemployment figures should address the period 1980-1983, not just the 1970-1980 period. Figures for the 1980-1983 period could be a beneficial impact on the area unemployment rate.

917 Page 3-49, Section 3.2.2.1.1 Sanitary Sewers. The City of Cheyenne has discovered that their wastewater flow measurements have not been accurate due to incorrect placement of the flow measurement devices. Past wastewater flows at the plants have been recording about one million gallons per day less than the actual flow entering each plant. The Cheyenne 201 Wastewater Facilities Plan will be amended to address this problem. The Peacekeeper Impact Study needs to investigate the magnitude of any impact on their proposals, and make any necessary changes.

911 Page 3-59, Section 3.2.2.3 Project Impacts. This study report states, "If the current 201 Facilities Plan is implemented prior to 1987, there will be 11.0 mgd of available capacity at Crow Creek (4.0 mgd) and Dry Creek (7.0 mgd) combined." However, this section does not discuss the fact of earlier extended use of pumps and other mechanical equipment in the wastewater sewer systems and treatment plants; thus decreasing their long term life. Additionally, a discussion should be presented relating that the Peacekeeper will probably cause an immediate increase in the City of Cheyenne population (Air Force) which will remain for the operational phase of the missile system. Therefore, the impact study should discuss how these actions might alter the Cheyenne 201 *Facilities Plan and the City of Cheyenne's 20 year planning schemes.*

Page 3-59, Section 3.2.2.4 Mitigative Measures. Add the wastewater flow measurement problem recently discovered by the City of Cheyenne.

913 Page 3-59, Section 3.2.2.4 Mitigative Measures. General Comment. The federal grant for upgrading of the City of Cheyenne's wastewater collection and treatment systems should be increased from the standard 75% federal rate (25% state) to a number reflecting compensation for increased Air Force population and earlier use/replacement of equipment. This increase should originate from DOD monies to help alleviate local impact during the initial (day 1) construction implementation.

920 Page 5-29, Section 5.2.2.2 Projected Baseline. No formal Town of Torrington 201 Facilities Plan is being prepared. If a limited survey of needs report is being planned, it should be thoroughly reviewed to ensure that any projected Peacekeeper impacts are discussed and conclusions stated.

97 General Comment. Under the mitigative measures for social services, transportation, library, fire protection, and law enforcement, additional services are indicated in the impact report. These additional services will cost dollars, and the funding sources should be identified and discussed fully.

Sincerely,

Leroy C. Feusner, P.E.
Southeast District Supervisor

LCF/kb

HE STATE OF WYOMING

Department of Health and Social Services

Division of Community Programs
HATHAWAY BUILDING CHEYENNE, WYOMING 82002

October 19, 1983

MEMORANDUM

TO: State Planning Coordinator's Office

FROM: Julie Robinson, Administrator

Please find attached a review of the Division's comments on the Air Force Impact study. Due to the nature of community programs, we xeroxed those portions of the study pertinent to each of the community programs that we fund and asked them to comment. I am attaching a copy of the comments that I received from Grandma's Safe House and I would assume your office would have received other comments.

Please excuse the delay in responding. I have been out with the flu and on vacation since October 3 and this has created some problems in meeting deadlines. If you have any questions about our comments, please call.

mlb

cc: Richard Davin

COMMENTS ON PEACEKEEPER IMPACT STUDY
Richard Davin

I. Summary

Population: 1800-1900 workers late '85 to early '86.

Money: Estimated income of $170MM during construction, $15MM maintenance.

Jobs: Peak period 3,300, permanent 650.

Impacts

1.3.10 Human Services
- increase caseloads
- lack of programs
- 2-person staff increase

Mitigation

1.4.10 Human Services
- meet staffing and facility needs
- institute a monitoring program to specify needs and project impact and to see if needs and impacts are as projected
- provide health coverage to accommodate private care

II. Report

Area Economy and Population (Peak year, 1987)

- 3700-4000 job seekers for approximately 3500 jobs

Laramie County Impacts

3.10.4 Human Services
- no impact (of significance) for Pathfinder, maybe one additional staff during 1986-87 even if population projections are low
- same for ARC and Halfway House
- SEWRHC will need two additional staff by 1985, plus one for emergency services during peak period. An increase of up to 219 additional clients is expected by 1992, 75 by 1987
- FVSA will require one additional staff by 1987. Project impact is estimated at 20-25 additional clients during 1986-87. More shelter space will be necessary.
- Stride learning center is projected to need two additional staff by 1992 plus two temporary buildings. Increase of 3-4 caseload is expected by peak year.

Note: The study implies that the need for additional staff and facilities

RECOMMENDATIONS/COMMENTS

These recommendations/comments refer only to Laramie County human service programs directly involved with the Division.

1. 745 All project impacts described in the study appear to be based on the increase of workers and those immigrating to find work. Little or no projections are made for accompanying families, thus all impacts in my estimation are extremely low.

2. 273 In raw, unsubstantiated estimates, the availability of between 3200 and 3500 jobs sought by 3700-4000 workers will result in a total population increase of 10-12 thousand if an estimate of families is included, i.e., the workers, a spouse, and one child as an overall average.

3. 745 It could be assumed that most of the alcohol and drug-related impact will be attributed to the workers, thus projections for Laramie County substance abuse services might be close. However, given the family orientation of Mental Health and Domestic Violence agencies, not to incorporate families and workers in the projections is inaccurate, i.e., projections should be based on a total population increase of 10-12 thousand rather than on 3700-4000 workers alone.

4. 734 The projections for project impact of Human Service agencies, in addition to being based on low population estimates, do not, or minimally, account for disproportionately high use of such agencies by the "newcomer" population. This has been substantiated through study of other impacted communities in Wyoming (e.g., Gillette and Rock Springs in the early '70's). No accurate predictor of such disproportionate use is available but historical data from previously impacted communities is.

5. Mitigation of project impacts must be initiated at the local, rather than State level for the following reasons:

   a. The local provider of services is better equipped to both predict and mitigate impact given their regular operation within, and contact with, the community. State involvement is generally limited to the provider agency alone and then only in a regulatory or contractual capacity. State agencies are not in a position to adequately or accurately predict or mitigate any situation which is unique to any given community. State primarily has concern for Statewide programming. Decisions affecting local communities are best made locally.

   b. Communities themselves generally do more extensive planning on local issues than do state agencies, thus, they are more in tune with workable solutions, e.g., Laramie County has had an MX Impact Planning Committee for nearly a year that has dealt with the projections of impact much more minutely and critically than the State could.

   c. Mitigative measures introduced to the local community by State agencies could easily be viewed as an intrusion for the reasons stated in (a) and (b) above.

5. c. Historically, the State posture has been to allow local communities to articulate their local needs and present them to the State for funding or other support within existing guidelines. For the State to introduce mitigative measures would counter that posture.

e. Response as to the pros and cons of the impact study are also better initiated at the local level. Local agencies provided most of the data gathered and are thereby more able to critique the analysis, e.g., the Cheyenne Chief of Police has already articulated flaws in the analysis to a degree not possible by a State agency.

f. It is only coincidental that the area to be impacted is the location of State government, hence the increased concern by State agencies. If we (State) are to be professionally involved in mitigation of project impact, it should be no more or less commensurate with our involvement in any other State-local issue. Evidence does not suggest that the State involvement in Gillette, Rock Springs, or Wheatland during their impact period approximates what we intend for Laramie County and Cheyenne. If we are to be heavily involved in our area (e.g., comprehensive critique of the study, introduction of mitigative measures, taking a lead role, etc.) it should be from the standpoint of personally affected citizens of the area rather than professionally as State representatives. Lead roles in mitigation rest in the community.

6. Specific Division Recommendations:

a. Serve as a technical assistant, consultant, and/or support resource to local agencies from a responsive posture.

b. If possible, maintain a contingency fund to aid programs impacted beyond their capability and State funding allotments.

c. Build normal growth potential into all funding mechanisms.

-jb

123

THE STATE OF WYOMING

Department of Health and Social Services

Division of Community Programs

HATHAWAY BUILDING CHEYENNE WYOMING 82002

November 9, 1983

MEMORANDUM

TO: Gary L. Throgmorton
M & SS Fiscal Control System Mgr

FROM: Julie Robinson
Administrator

RE: Review and Comments Per Attached Memo

Attached is the Division response to the Impact Study. I have assigned Richard Davin of my staff to work in this area. If you have any questions, please call him at 7118.

I have been doing some work with the Governor's office and Ellen Crowley on hosting a meeting of local providers to insure we are getting their input. You are welcome to assist and/or attend the meeting.

sd

Attachment

cc: Jean DeFratis
Richard Davin

COMMENTS ON PEACEKEEPER IMPACT STUDY, DRAFT 2

Richard Davin

1. In reviewing the second draft I see no significant changes in information from the first except one, i.e. the first draft indicated some 3,500 "jobs" would be filled during peak years, leading one to believe there would be a need for about 3,500 workers not including families. Draft 2, however, indicates a highest manpower need of 1,774 workers during 1986 with a total increase in population for Laramie County of less than 4,000, including dependents. My original comments projected a total of 10,000 population increase based on the 3,500-jobs figure.

224

2. Reference Chapter 3.1.5.

3.1.5 p.3-84 Social Well-being and Public/Human Services

The study acknowledges the current inadequacy of the Human Service System to care for the existing population; and that an increased migration would result in a significant, moderate, short-term impact. They do claim, however, that the demographics/characteristics of the immigrating population is similar to the existing population (i.e. age group 15-34) and thus the increase would not call for unique or peculiar remedies, only an increase in capacity for the existing system.

502

Comment: One remedial strategy may be to compute the projected population increase and multiply it by the per capita funding formulas we have now to arrive at an impact dollar figure. This, of course, does not account for the "synergistic" affect that may accompany the new residents, i.e. the impact of X thousands of people may not be limited to the mere increase in numbers, rather the stresses of interpersonal relationships between "newcomers" and "oldtimers," perceptions of "turf," strange people and surroundings, etc. may lead to disproportionate problems and needs for human services. This could be a particular problem for police, drug and alcohol agencies, family violence agencies and mental health.

3. These comments, generally, reflect the same issues raised in my comments for draft 1.

124

THE STATE OF WYOMING

Department of Health and Social Services

Division of Health and Medical Services

HATHAWAY BUILDING CHEYENNE WYOMING 82002

MEMORANDUM

TO: Mr. Fred Lund
Department of Health and Social Services

FROM: Lawrence J. Cohen, M.D.
Administrator

DATE: November 2, 1983

RE: Review of The Health Care Section of the Draft Environmental Impact Statement Dated October, 1983

545 The Health Care Section for Laramie County superficially treats the physical structures dedicated to health care and roughly describes the health care manpower. I have no conflict with that which is reported, however, I do not believe the statement considers the total impact of hundreds or thousands of new people in the area.

546 I feel that the people impact can be readily handled by existing physicians and hospitals. I have serious concerns as to whether nor not the city/county public health personnel and facilities could deal with the problems of a large itinerant population in that the staff and facilities are currently overtaxed.

547 The working population increases generally are not nursing home candidates, however, elderly persons who are eligible for nursing home placement may accompany working and support persons. Cheyenne existing nursing homes are at capacity.

548 Reference in the impact statement concerning private medical clinics is both confusing and inaccurate.

125

THE STATE OF WYOMING

OCT 12 1983

Laramie County Office of the Division of Public Assistance and Social Services

700 WEST 21ST STREET CHEYENNE, WYOMING 82002 (307) 777-7921

October 7, 1983

Industrial Siting Administration
Boyd Building, 5th Floor
Cheyenne, WY 82001

Dear Sirs:

I would like to submit my comments in regard to pertinent material in Volume I of the Department of the Air Force Socioeconomic Impact Study.

On page 3-268, the first paragraph under baseline description, the word Department should read Office.

In the third paragraph, the (WIN) should read Work Incentive Program.

The third paragraph from the bottom on this page should identify the shortage of foster homes as a great need and not necessarily the greatest unmet need

The last paragraph on this page indicates a need for emergency shelters for children. This is a very great need and will intensify with impact

720 On page 3-269, the second paragraph, next to the last sentence reads, "In 1980 a standard of 143.35 points per public assistance worker was established." I believe this should read 125 points. Attached please find two pages of the referenced publication. Under the organizational structure on page 3 is the following sentence, "It has been predetermined through 100% survey of all workers that one worker can be expected to adequately administer 125 case points." This is the January 1, 1980 publication.

718 At the bottom of this page, last paragraph is the ratio of one social worker to 5,800 people. This is an arbitrary figure. Other factors than population have great impact on social service needs. This information along with the chart on page 3-271 would indicate overstaffing. By comparing this to the bottom paragraph on page 3-268 we find an incongruity. Based on national averages, the workload in Laramie County is already double the national standard

Information on page 3-270 indicates that our current facility will be adequate To add any staff at all will require remodeling. The anticipated impact could very well require a larger facility.

747 The third paragraph from the bottom of this page indicates that clientele needs with the project are not anticipated to be different from the needs of current D-PASS users. The transient, mobile type of people that we deal with have special problems. They do not have a family support base in the community, they are strangers to the community and to the schools, they have not established their credit rating, they are repeatedly in need of money for deposits for utilities, they do not have established health care or a family physician; just to name a few of their differences.

738 The bust phase of the boom/bust cycle is not well-addressed in this material. Statewide experience has indicated that there are unique problems in this phase. The downturn in economy creates an upturn in economic problems and other family and personal frustrations related to the depressed economic situation.

I hope this reaction will be considered in evaluation and mitigation of our concerns.

Sincerely,

Ralph C. McConahy
County Manager

RCM/je
Attachment

III. Public Assistance Workers

The function of the public assistance worker is to determine the eligibility of an applicant for benefits, verify the documentation submitted, prepare the forms that initiate the funding for or in behalf of the client, initiate input documents to effect the benefits to a client or when changes occur, to reevaluate the applicant's on a periodic basis and terminate benefits when completed.

Public assistance workers are responsible for and are knowledgable in seven standard income maintenance programs:

1. Aid to Families With Dependent Children (AFDC)
2. Aid to Families With Dependent Children - Foster Care (AFDC-FC)
3. Licensed Sheltered Care (LSC)
4. Food Stamps (FS)
5. Emergency Assistance/ General Assistance (EA/GA)
6. Minimum Medical Program (MMP)
7. Supplemental Security Income (SSI)

Although the amount of work required in individual cases may vary, there is sufficient similarity within each program that the energy needed to be expended can be averaged and measured. The Division used a formula of "Relative Value". AFDC cases are the most difficult to administer. AFDC cases, therefore, is the established norm of one. All other programs have a relative value of less than one. Through a survey of all workers in public assistance, relative values as placed on the seven programs they administer, are as follows:

A.	AFDC	1.0
B.	AFDC-FC	.6
C.	LSC	.8
D.	FS	.8
E.	EA/GA	.6
F.	MMP	.6
G.	SSI	.1

Caseload information is retained on all counties. A copy of the month of October, 1979 is enclosed. This shows the total number of case points for each county. The total number of actual cases exceeds the case points in accordance with the decimal fraction used to determine the case points. It has been predetermined, through 100% survey of all workers, that one worker can be expected to adequately administer 125 case points. Any additional load will increase the error rate potential.

126

THE STATE OF WYOMING

Laramie County Office of the Division of Public Assistance and Social Services

700 WEST 21ST STREET CHEYENNE WYOMING 82002 (307) 777-7921

October 6, 1983

Ms. Ellen Crowley, Chairman
Scoping Mechanism Subcommittee
on the Air Impact
Petion Building, Suite 223
852 Capitol
Cheyenne, WY 82001

Dear Ellen

[illegible] in response to your memorandum of September 27, 1983. Following are my comments in regard to pertinent material in Volume [illegible] of the Department of the Air Force Socioeconomic Impact Study

On page 3-268, the first paragraph under baseline description, the word department should read office.

In the third paragraph, the (WIN) should read Work Incentive Program

The third paragraph from the bottom on this page should identify the shortage of foster homes as a great need and not necessarily the greatest unmet need

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718 Information on page 3-270 indicates that our current facility will be adequate To add any staff at all will require remodeling. The anticipated impact could very well require a larger facility.

Ms. Ellen Crowley
October 4, 983
Page 2

747 The third paragraph from the bottom of this page indicates that clientele needs with the project are not anticipated to be different from the needs of current D-PASS users. The transient, mobile type of people that we deal with have specia problems. They do not have a family support base in the community, they are strangers to the community and to the schools, they have not established their credit rating, they are repeatedly in need of money for deposits for utilities, they do not have established health care or a family physician; just to name a few of their differences.

738 The bust phase of the boom/bust cycle is not well-addressed in this material. Statewide experience has indicated that there are unique problems in this phase. The downturn in economy creates an upturn in economic problems and other family and personal frustrations related to the depressed economic situation.

I hope this reaction will be considered in evaluating the mitigation of our concerns.

Sincerely,

Ralph C. McConahy
County Manager

RCM/ e
Attachment

97

ORGANIZATIONAL STRUCTURE

OF THE COUNTY D-PASS OFFICES

DIVISION OF PUBLIC ASSISTANCE & SOCIAL SERVICES

January 1, 1980

98

...Public Assistance workers

The function of the public assistance worker is to determine ... in initial or continuing for benefits, verify the documentation submitted, prepare the forms that initiate the funding for or in behalf of the client, initiate input documents to effect the benefits to ... or when changes occur, or reevaluate the applicant's on a periodic ... to terminate benefits when completed.

... workers are responsible for and are knowledgable in ...

1. Aid to Families With Dependent Children (AFDC)
2. Aid to Families With Dependent Children - Foster Care (AFDC-FC)
3. Licensed Sheltered Care (LSC)
4. Food Stamps (FS)
5. Emergency Assistance/ General Assistance (EA/GA)
6. Minimum Medical Program (MMP)
7. Supplemental Security Income (SSI)

Although the amount of work required in individual cases may vary, there is sufficient similarity within each program that the energy needed to be examined, in the aggregate and measured. The Division used a formula of "Relative Value". AFDC cases are the most difficult to Administer. AFDC cases, therefore, is the established norm of one. All other programs have a relative value of less than one. Through a survey of all workers in public assistance, relative values as placed on the seven programs they administer, are as follows:

A.	AFDC	1.0
B.	AFDC-FC	.6
C.	LSC	.4
D.	FS	.3
E.	EA/GA	.4
F.	MMP	.4
G.	SSI	.3

... Based on these relative values, a supervisor can ... Whether ... is employed. This shows the total number of case points for each county. The total number of actual cases exceeds the case points in accordance with the decimal fraction used to determine the case points. It has been predetermined, through 100% survey of all workers, that one worker can be expected to adequately administer 125 case points. Any additional load will increase the error rate potential.

99

127

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Health and Social Services

Office of the Director

HATHAWAY BUILDING
CHEYENNE, WYOMING 82002
TELEPHONE (307) 777-7656
TTY 777-7586

November 28, 1983

MEMORANDUM

TO: DICK HARDMAN, PLANNING COORDINATOR
STATE PLANNING AND COORDINATION

FROM: Frederick J. Lund, Administrator
Office of Planning and Administration

SUBJECT: Comments on the Draft Environmental Impact Statement, Peacemaker - October, 1983

549 The Department of Health and Social Services administers 60 programs that will be directly impacted by the deployment of the Peacemaker in Minuteman Silos in the four southeast counties of the state (see attached listing). A few of these programs were addressed superficially in the October Impact Statement.

Our experience with rapid growth and the eventual population leveling in Wheatland, Gillette, and Uinta County tells us that there is a tremendous lag between the actual demands for services and governments willingness to make the essential resources available for people programs. A similar lag occurs during the leveling period with regards to stabilizing the health and social services delivery systems in the impacted areas.

Funding for our programs is provided by federal, state, and local governments. Currently 43% of our funding comes from federally subsidized programs. The formulas used to allocate funds to each state are usually based on population estimates. These formulas are not sensitive enough to the boom/bust areas to make up for the relatively short time increased demands for services. That leaves state and local government with the burden of funding a majority of our programs being delivered through local offices. Increased demands for all services require additional personnel or funds for grants to individuals or local private non-profit service providers.

Memo - Dick Hartman
Page #2
November 28, 1983

The basic subsistence programs of the department are the most severely impacted. Individuals and families who arrive in the area in anticipation of employment need assistance with food and shelter, usually over an extended period of time. The prudent management of these programs is essential. Families should not be encouraged to remain in an area that is not going to be able to provide them with a permanent means of support. Managing this type of a caseload takes a great deal of staff time. Funding for these types of programs comes directly from state and local taxes.

There are numerous variables in anticipating the need for these types of programs. The Uinta County experience reflected a national recision which brought people in from all over the country. The impact of the Peacemaker project will have its own unique set of outside unpredictable variables.

Planning for these services needs to be done at the local level through a coalition of private welfare agencies and local D-HSS staff.

549 Remedial and rehabilitation services provided through social services, vocational rehabilitation services and the services funded through local private non-profit agencies will need to prepare for a more sustained growth in demands for services. I have attached a memorandum from Julie Robinson, the Administrator of the Division of Community Programs addressing these impacts.

Health maintenance and preventive health problems resulting from the rapid growth are addressed in Dr. Cohen's memorandum, also attached.

The Department is in the process of developing its Management Report for the 1984 Session of the Legislature. That report will detail the current status of each of the 60 programs in our budget for FY 85/86.

All of the programs detailed in the report can be broken down by county. I suggest that that document be used as the basis for assisting local agencies in the development of a final plan to mitigate the human services costs associated with the Peacemaker project.

I have attached the 1983 Management Report as an example of what will be available.

The D-HSS, Office of Planning and Administration is prepared to assist local D-HSS offices with their participation in the project.

vkw

Attachments

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Labor and Statistics

HATHAWAY BUILDING CHEYENNE WYOMING 82002 (307) 777 7261

VERNA E. MARTIN
COMMISSIONER

MICHAEL J. SULLIVAN
DEPUTY COMMISSIONER

MEMORANDUM

TO State Planning Coordinator

FROM Michael J. Sullivan
Acting Commissioner

DATE October 11, 1983

SUBJECT MX Impact Document Review

Attached are the comments for the Wyoming Department of Labor concerning the Wyoming and Nebraska Socioeconomic Impact Study of the MX.

As the comments indicate, the impact will be significantly less upon this department as was estimated with the Dense Pack mode. We feel that our present staff can handle this impact without any decrease in efficiency and professionalism.

If you have any questions concerning these comments, please contact me.

WAGE AND HOUR DIVISION

Since the implementation of the MX has changed to existing silos, the impact upon the Wyoming Department of Labor will be significantly less than was estimated with the Dense Pack deployment. There still may be problems similar to those submitted in our earlier report in the areas of collective bargaining and Department of Defense jurisdiction.

However, in talking numbers, the amount of additional wage claims should be minimal with no need for additional staff. In using the figures from the Socioeconomic Impact Study Vol 1, page 2-14, it shows a peak of 3,250 additional jobs in 1987 created because of the MX deployment. Historically, our office has averaged around seven (7) wage claims per thousand employees in the work force. This would show an additional 23 wage claims in the peak year of 1987. One point should be made here. Once the major thrust of the installation is completed, the wage claims will more than likely increase beyond the seven (7) per thousand employees. We experienced similar impact in Rock Springs, Green River, Gillette and Evanston. Once major development ended in these areas, businesses failed or closed and our office experienced higher than normal wage complaints. Again, using the figures on page 2-14, our office would probably experience the bulk of these wages claims after 1987.

FAIR EMPLOYMENT DIVISION

This division handles discrimination complaints and would also experience some impact. However, not to the extent as was anticipated with the Dense Pack. Historically, this division has experienced about two (2) complaints per thousand employees in the work force. Using the peak figures estimated in the impact statement of 3,250 additional jobs in 1987, this division can expect an increase of six (6) or seven (7) additional discrimination complaints a year. This again will not warrent any increase in staff.

804 All in all, the impact upon the Wyoming Department of Labor will be minimal based upon the Socioeconomic Impact Study of using existing silos

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THE STATE OF WYOMING

Commissioner of Public Lands and Farm Loans

2424 PIONEER AVENUE
PIONEER BUILDING

CHEYENNE, WYOMING 82002

November 18, 1983

PLEASE ADDRESS REPLY TO THE COMMISSIONER

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2120 Capitol Avenue
Cheyenne, WY 82002

Re: Review of Draft Environmental Impact Statement - Peacekeeper in Minuteman Silos, October 1983

Dear Mr. Hartman:

507 This letter represents my comments on the above-referenced Draft Environmental Impact Statement in my capacity as Commissioner of Public Lands and Farm Loans.

The Wyoming Farm Loan Board, which is comprised of the five top elected officials of the state of Wyoming, has been charged by the legislature to assist communities within the state which have been adversely affected by rapid growth which has been caused by mineral development within the state. Primarily, the Board funds the construction of facilities for political subdivisions which have been severely impacted by sudden growth. Therefore, I am very familiar with and keenly interested in impact problems which will be faced by the City of Cheyenne and Laramie County as a result of the placement of the Peacekeeper missiles. It is with this background and knowledge in mind that I offer the following observations about the DEIS.

Because the state programs can be used to fund construction projects, rather than the provision of services, I have concentrated on those mitigation measures identified in the DEIS which will involve possible construction of facilities. Therefore, my remarks are limited to an examination of the material contained in Chapter 3.

1. Construction of new city/county jail

In Section 3.1.3.6.2, it is observed that Laramie County and the City of Cheyenne should "continue to pursue grant funding for the new city/county jail." This section indicates to me that a need for a new jail facility has been identified.

2. 201 Regional Wastewater Facility

In Section 3.1.7.6. the City is advised to implement an extant 201 plan by 1985, using "local agencies and funding sources."

3. General Government mitigation

In Section 3.1.6.6.7, relocation of the county shops to a more suitable facility and location is listed as a mitigation measure.

4. Street Construction

507 In Section 3.1.9.6, one finds a lengthy description of necessary road construction work, particularly near and around F.E. Warren Air Force Base.

This list is meant to be an illustrative, rather than exhaustive, treatment of the kinds of facilities which will be necessarily constructed as a result of the Peacekeeper placement. Of concern to me is the fact that there is no specific source of funding identified for any of these projects. I do not know if the drafters of the DEIS assumed that the city or the county or the state could easily take care of financing these facilities.

It should not automatically be assumed that the State of Wyoming can or should fund any of the projects which will be constructed as a result of the Peacekeeper activities. That part which comes from the State's share of federal mineral royalties is required by the federal law to be used for alleviation of the impact of mineral development. It cannot properly be used to alleviate MX impacts. All of the state grant programs are related to mineral impact activities. The burden will be on Cheyenne and Laramie County to prove that they are eligible applicants for state funding. Further, even if the entities can be shown to be eligible, one must recognize that there is a great deal of competition for available funds among many Wyoming communities.

507 I observe that a great deal of time and money has gone into preparing the DEIS, WNSIS and other voluminous documents connected with the proposed project. It appears to me that it would have been much better to pay the consultants $3,000,000 for the reports and to have given Cheyenne and Laramie County the other $9,000,000 plus, which has been expended in preparing the DEIS. In short, the thing has been studied ad nauseum. It is time to put some effort and money into alleviating impact.

I reserve final comment on the DEIS until the Financial Analysis, which is due in January, 1984, has been reviewed, for it is my view that all of the documents must be read as a single statement as to what effect the placement of the Peacekeeper will have on the health, happiness and well-being of the citizens of Cheyenne and Laramie County.

I will be happy to discuss these observations with you at any time

Sincerely,

Oscar E Swan

Oscar E. Swan
Commissioner of Farm Loans

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THE STATE OF WYOMING

Commissioner of Public Lands and Farm Loans

2424 PIONEER AVENUE
PIONEER BUILDING

CHEYENNE, WYOMING 82002

October 14, 1983

PLEASE ADDRESS REPLY TO THE COMMISSIONER

Mr. Dick Hartman
State Planning Coordinator
Cheyenne, Wyoming 82002

Re: Review of Wyoming and Nebraska Socio-economic Impact Study (WNSIS)

Dear Dick:

I offer the following comments and observations concerning the WNSIS as Commissioner of Public Lands and Farm Loans. The focus of my review has been to analyze the document from a general point of view, rather than concentrating on details, with the obvious goal being an identification of areas which, in my view, have not been adequately addressed or which have been inaccurately discussed. Essentially, my comments are concerned with the impact which placement of the Peacekeeper Missiles will have on the state agencies with which I am associated.

These comments cannot address all potential aspects of the impact problems which are necessarily associated with Peacekeeper placement in Wyoming. It appears to me that no comments can, in fact, be complete and accurate if one is not provided all of the documents at one time. It is impossible for me, as Commissioner of the Farm Loan Board, to get a proper perspective of the effects of impact and how the impact-related problems can be solved without reference to the Fiscal Impact Analysis, a document which will not be available until February 1, 1984 and the Environmental Impact Statement.

68 The general tenor of the WNSIS is to understate all potential impact problems. Illustrative of this is the overly broad statement, which seems to act as the document's touchstone, that "There are no adverse impacts resulting from the immigrant population per se." (Vol. 1, P.1-7). This extreme understatement technique is prevalent throughout the three volumes and causes me to wonder whether the answer was arrived at before the problem was defined. Therefore, I find it hard to accept many of the conclusions concerning the minimal impact which southeastern Wyoming will allegedly experience.

Generally, the document presumes that there will not be a great need to mitigate impact-related problems. However, when such problems are identified, it appears that it is assumed that local financial means will be available.

While I cannot represent what the financial capabilities of the affected municipalities and counties are, I can advise that although the State of Wyoming has programs to assist in addressing problems created by impact created by sudden population growth, it is my view that projects necessitated by the deployment of the Peacekeeper Missile would not be eligible for State assistance in the form of grants. Essentially, because of statutory restrictions any mitigation funds will have to come from sources other than coal tax and mineral royalty grants. The source of the funding for both coal tax grants and mineral royalties grants is such that I question whether the laws providing for such grants could be amended to allow such grants to be used to mitigate impact caused by the Peacekeeper Missile. 93

I will be happy to discuss these concerns or any other aspects of the potential impact problems brought about by Peacekeeper deployment with you at your convenience at greater length.

Yours sincerely,

OSCAR E. SWAN, COMMISSIONER OF
PUBLIC LANDS & FARM LOANS

YES:MBG/ekh

cc: Mary B. Guthrie,
Sr. Assistant
Attorney General

THE STATE OF WYOMING

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ED HERSCHLER
GOVERNOR

Employment Security Commission

ESC BUILDING P O BOX 2760 CASPER, WYOMING 82602

MIKE VINICH
CHAIRMAN

FRANK M. SHAFFER
VICE CHAIRMAN

ROBERT PAPPENHEIM
COMMISSIONER

DICK SADLER
EXECUTIVE DIRECTOR

November 10, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Gentlemen:

Enclosed are our comments on the Draft Environmental Impact Statement for Peacekeeper in Minuteman Silos, as you requested from Mr. Dave Marshall of our Cheyenne Job Service Center.

Since both the Job Service and Unemployment Insurance Divisions of this Agency will be impacted by this project, both Divisions have compiled comments, which are attached. Both include projections of additional staff and funding needs.

If we can provide any further assistance, please feel free to contact Dave Marshall directly.

Sincerely,

Dick Sadler
Executive Director

enclosures

JOB SERVICE

The Job Service of Wyoming submits the following comments on information contained in the "Draft Environmental Impact Statement" published by the Department of the Air Force. These comments also apply to the "Wyoming and Nebraska Socioeconomic Impact Study" published by the Department of the Air Force. We did not comment on this publication when issued.

The comments we wish to make concern the predicted labor force need, the impact on the community of unsuccessful job seekers and methods of reducing the impact of these job seekers on the project area.

A. Air Force predictions for construction workers and for assembly and check-out workers seem reasonable. However, we do feel that the local labor force is broader than the Air Force has shown in table 2.2.1-2, Total Jobs, Local and Regional Hires and Immigration (Wyoming and Nebraska Socioeconomic Study). In this table the Air Force predicts a peak year (1987) Average Annual Immigrant Workers of 1,698 people. We think this figure is too high. By using the local labor force fully and by using daily and weekly commuters this figure can probably be brought down to half of that figure or approximately 850 immigrant workers. It may be necessary to provide limited training to the local labor force in short term intensive courses to bring up technical skills for assembly and construction openings, but such would be preferable to bringing in outside workers. Funds for such training should be available through the new Job Training Partnership Act (JTPA). The training could be provided by the Community Colleges, or through the private employers and Job Service of Wyoming. 236

Also by working with local unions, project contractors, vocational schools, and regional Job Service offices, the need for immigrants can be significantly reduced.

B. The number of job seekers who will come to Cheyenne and surrounding communities because of national publicity on the Peacekeeper Project is not addressed in the Air Force publications. The impact of the immigrant worker is addressed, but the applicant who never finds work is not addressed.

Our past experience has shown that the number of transient job seekers coming into an area increase for two possible reasons:

1. When unemployment increases in other parts of the country, Job Service offices along major transportation routes, specifically Cheyenne, are contacted by increasing numbers of job seekers who are travelling through, and must be provided local labor market information at a minimum.
2. When an increas in hiring activity is publicized, such as in energy, the Job Service offices in the impact areas have been contacted by larger numbers of transient job seekers as the apparent easy availability of jobs is communicated to other areas of the country. 497

In either case, most do not posses needed skills and will not have monetary resources to long maintain themselves without help. They will look for work until their money, and public sources of help, run out.

Such people seek help from Job Service, the Department of Public Assistance and Social Services, the Salvation Army, the COMEA Shelter, Needs Inc., and other agencies. In Cheyenne, all these agencies are operating near or at capacity. The impact of additional out of town job seekers per year will cause severe problems to these agencies.

It has been the experience of the Cheyenne Job Service Center that 2,000 to 2,500 out of town applicants seek work through that office each year when the Wyoming unemployment rate is low compared to the

rest of the Nation in 1981 and 1982 the number of job seekers from out of state went up. When Wyoming's unemployment rate went up in 1983, out of state traffic dropped.

If Wyoming's unemployment rate stays above average and the rest of the nation continues to make progress in it's economic recovery, the impact of out of state workers who seek work on Peacekeeper will be less than if Wyoming's unemployment rate drops and the recovery in the rest of the nation is stalled or reversed.

Based on previous experience in Cheyenne, and on impacts of the Jim Bridger Power Plant at Rock Springs and the Missouri Basin Project at Wheatland, we think that the number of out of town job seekers contacting the Cheyenne Job Service Center will double to around 5,000 per year, and might go as high as 10,000 if the national economy worsens.

497 We expect the Torrington Job Service to be contacted by an additional 500 job seekers. We expect this number of job seekers attracted by publicity about the project, irregardless of the level of actual project activity.

In Cheyenne approximately 900 different job seekers are served by each funded staff position, since 10.1 staff positions served 9,100 new or renewal job seekers in fiscal year 1983. To process an additional 2,500 applicants would require three new staff positions in Cheyenne, and an additional 500 applicants would require an additional 0.5 staff position in Torrington. This minimum additional 3.5 positions will require an additional expenditure for all costs of about $102,000 per year in the Cheyenne and Torrington Job Service operations.

c. The Air Force publications have suggested there be a "job referral

237 service dedicated to project-related employment (over and above the usual "hiring hall" arrangements for construction workers). An efficient referral system, especially one involved with all forms of available jobs, both direct and indirect, would reduce labor market friction." ("Wyoming and Nebraska Socioeconomic Impact Study.")

The Job Service of Wyoming offices perform such a job referral service. The Job Service of Wyoming has the staff and facilities to help reduce the frictional unemployment caused by the Peacekeeper Project. Without a central referral office for all Peacekeeper related jobs contractors will experience a continual stream of job applicants which they do not want to see and cannot hire. Employers will have to utilize time and resources to control these job seekers.

Applicants will waste their time and limited financial resources going from one contractor to another, and will become angry and frustrated.

237 By listing all job openings through Job Service, the time it takes an applicant to find a job, or to realize that there is no work available for them, will be reduced. This will save valuable resources for the community as the unemployed job seeker will find employment or will leave in a shorter time period than if they "make the rounds" to all contractor work sites.

The Cheyenne Job Service office can and should be used as the Peacekeeper job referral office since the great majority of job applicants seeking work will contact the Job Service office at some point anyway. The Cheyenne Job Service has a well trained staff and a large facility with desks and offices available for use by Peacekeeper contractors. Contractors may use the office to conduct interviews, to prescreen applicants, to announce and promote job openings and to relieve construction sites of the constant job applicant traffic by posting signs referring applicants to Job Service.

The indirect job openings which occur because of the Peacekeeper project can also be filled through the Job Service which has the largest

237 pool of job applicants in all job categories. The Job Service can also benefit the Peacekeeper project labor exchange process through its access to the nationwide Job Bank system. Job Orders listed for which no local applicants are available can be published nationwide in seven to ten days. There will also be a need for nationwide publicity alerting job seekers not to come to Cheyenne without a job offer. This type of labor market information can be disseminated through all Job Service offices, and can be an effective way of reducing the number of unattached job seekers.

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THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

Employment Security Commission

ESC BUILDING P.O. BOX 2760 CASPER, WYOMING 82602

MIKE VINICH, CHAIRMAN — FRANK M. SHAFFER, VICE CHAIRMAN — ROBERT PAPPENHEIM, COMMISSIONER — DICK SADLER, EXECUTIVE DIRECTOR

November 10, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Sir:

Unemployment Insurance Activities Impact, Wyoming Employment Security Commission
Peacekeeper in Minuteman Silos, State Identifier: 83-149

The "Draft Environmental Impact Statement" of the Department of the Air Force dated October, 1983, includes a number of tabulations upon which impact projections of Unemployment Insurance functions can be based to some degree. These include "Average Peacekeeper Manpower Requirements By Years", "Total Jobs, Local and Regional Hires, and Immigration", and "... Project Annual Unemployment Percentage Rates."

We take exception to the last named tabulation's entries since it clearly deals only with unemployment relative to current unemployment. It is an established fact that any major construction activity which results in any degree of impact (and Wyoming has had a number of these) brings with it problems in rendering unemployment insurance services above and beyond the base unemployment status. A discussion of these follows:

206

1. An increase preceding and during Peacekeeper construction of new service and retail businesses which must be registered in the field and processed in the Central Office.

2. An increase of sub-contractors and contractors from out-of-state who must also be contacted, registered, and given service both in the field and in the State Office.

3. These foregoing accounts result in a substantial quantity (on a quarterly and recurring basis) of wage records which equal the "projected work force" plus the "indirect employment requirements". These will cause a considerable increase in computer entry, data processing and computer storage.

State Planning Coordinator — November 10, 1983

4. The dependents (secondary wage earners) accompanying the persons employed in the project result in a substantial number of new agent-state unemployment insurance claims with a concomitant increase in unemployment insurance claims workload in the Cheyenne Claims Office plus a substantial increase in Combined Wage Claims for part of the same group. This results in an increased workload in the field claims-taking office, in the central Office and in the Data Processing Area.

These factors, based on previous experience in other impact areas, would indicate an increase in staffing in the Cheyenne District Claim Center, increasing gradually in the formative years of the project and continuing on a high level post-completion of the project for at least one year as follows.

	1984	1985	1986	1987	1988	1989	1990	1991
Staff Increase:	1.0	1.0	1.5	2.0	2.0	2.0	2.0	2.5

206 A State Office staffing increase is anticipated due to the processing of employer accounts, combined wage claims, the processing of wage records, and a developing workload of regular unemployment insurance claims for a total of two (2, to three (3) positions during the full impact years of 1986 through 1990.

Further increased demands are anticipated in the following areas: postage, paper for forms and correspondence, furniture and equipment (both in the field and in the central office) including an additional computer terminal in the Cheyenne DCC, telephone costs, and travel costs.

In summary, the personnel costs and non-personnel services costs are expected to be the equivalent of a minimum of four to five positions during the maximum impact years (1986 through 1990).

These projections are based, as indicated, on the impact statement, as follows ...personnel will reach its peak in 1986, when 1900 persons will be required, ... by 1991 a 500 person permanent operations work force will be in force. The peak of immigration (1987) will see 3600 new persons in the study area with 1600 persons immigrating in 1987 in indirect employment requirements.

Sincerely,

Harold Sadler
State Administrator for Unemployment Insurance

cc: Mr. Sadler

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THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

Game and Fish Department

CHEYENNE WYOMING 82002

W. DONALD DEXTER, Director

November 15, 1983

EIS 233/L7
U.S. Department of the Air Force
Peacekeeper in Minuteman Silos - DEIS and EPTR's

Mr. Dick Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Attention: Mr. Paul Cleary

Dear Mr. Hartman:

Because of the limited time permitted to review these documents, our review was not as thorough as it might be. The following comments are offered after a hurried perusal of the DEIS and Biological Resources and Water Resources EPTR's.

1173 1. Affected Environment - Section 2.1.11 - Recreation - No mention is made, in this section, of wildlife-related recreation. Data on hunting, fishing, trapping, and nonconsumptive use of wildlife are completely absent. This is a glaring omission, and should be corrected.

1379 2. Affected Environment - Section 2.2.2.2.2 - Wildlife - Wildlife data presented in this section appear to be quite adequate. It should, however, be noted on Page 2-114, that the swift fox is considered to be a species of high biological priority in Wyoming, as noted in Current Status and Inventory of Wildlife in Wyoming, Wyoming Game and Fish Department, Cheyenne, Wyoming 1977.

1154 3. Environmental Impacts - Section 3.1.11 - Recreation - No documentation is provided in this section for the estimated impacts on wildlife-associated recreation. The impacts of increased human population on hunting and fishing are a significant source of concern to users of the wildlife resource in Wyoming, and they have widespread ramifications with regard to our ability to management wildlife. For example, the document states that the area which is expected to receive the most increased

1154 recreation pressure within the Area of Concentrated Study is Sloans Lake, and that this increased pressure will come mainly in the form of swimming. We would like to point out that Sloans Lake, as well as Country Club Lake in Cheyenne, presently receive a substantial amount of fishing pressure and that this aspect of recreation will be impacted due to overcrowding or overutilization of the fishery resources in these two lakes. In our comments of October 24, 1983, on the socioeconomic study, we reiterated

1174 earlier recommendations that studies be included to determine where the people of Cheyenne, including the anticipated population increase attributed to the MX Project will hunt and fish in order that the impacts to Game & Fish Department Programs can be determined. Since that time, we were contacted by the consultants to whom we furnished additional survey data and direction. This section of the DEIS should be revised when the socioeconomic study is finished. We request that documentation for the estimated impacts be provided.

1155 4. Section 3.1.11.6 - Mitigation Measures (Recreation) - We are pleased to see the inclusion of an environmental awareness program under consideration as a mitigative measure. We believe that a program such as this could help relieve some of the impacts on wildlife associated with the Peacekeeper program, and urge that this measure be adopted.

1154 We recommend consideration of measures to mitigate fishing and other water based recreation impacts on Sloans Lake and Country Club Lake, as well as other areas in the state that will be used by the increased population. Sloans Lake was identified as a candidate for possible improvement under the EPA Clean Lakes program due to water quality use impairment. Improvement of water quality and fish habitat in Sloans Lake or development of additional fisheries should be examined as potential mitigation.

BIOLOGICAL RESOURCES EPTR

1447 Page 3-67. The location of aggregate quarries in or adjacent to streambeds, though possibly providing for improved fish habitat as stated in the document, may cause severe and prolonged erosion and sedimentation problems. Such quarries would have to be reviewed on a case-by-case basis to determine impacts, acceptability, and mitigation measures. As a rule, it is best from an environmental aspect, to locate borrow areas and quarries outside of floodplains.

1445 Page 3-81. The mitigation measures listed here are said to be under consideration and may or may not be implemented. We recommend that the

1445 USAF commit to and implement all of the listed potential mitigation measures.

WATER RESOURCES

1346 Page 3-107, 108. We encourage investigation into water use demand reduction measures such as reuse of treated wastewater effluent for municipal irrigation and water conservation measures. Such measures would decrease the demand on the Cheyenne water supply system, present or moderate the water supply deficits expected during Stage II construction, and prevent the environmental problems that could be associated with the supply augmentation measures mentioned in the document.

1361 We are disappointed to note that no mention is made of providing funding for additional wildlife law enforcement personnel. As we noted in our comments on the Peacekeeper Socioeconomic Impact Study, we believe that the impacts on wildlife associated with this program are related primarily to human impacts. We see no reason why the State of Wyoming should be required to absorb these impacts. We believe funding for an additional game warden position for a period of time coincidental with peak employment should be considered as a mitigation measure in this DEIS.

Please forward these comments to the Department of the Air Force. Please contact us if we may be of further help.

Sincerely,

Bill Morris
BILL MORRIS
ASSISTANT DIRECTOR
SERVICES
WYOMING GAME AND FISH

BM:KBM:blg
cc: Game Division
Fish Division
R&D Division
Planning

134

ED HERSCHLER
GOVERNOR

Game and Fish Department

CHEYENNE, WYOMING 82002

October 24, 1983

EIS 233/ES
U.S. Department of the
Air Force - Peacekeeper
Project - Wyoming/
Nebraska Socioeconomic
Study

Mr. Dick Hartman
State Planning Coordinator
3320 Capitol Avenue
Cheyenne, Wyoming 82002

Attention: Mr. Paul Cleary

Dear Mr. Hartman:

1452 The following comments are presented after review of this study.

This impact study is adequate in most respects. We strongly disagree, however, with the conclusion (noted in Section 10.2) that no increase in the level of fish and game law enforcement is recommended.

1451 The data presented from our Sheridan District, in northeastern Wyoming, clearly show an increase in game law violations from 298 in 1975 to a peak of 922 in 1978, then a gradual decline to 452 in 1982. Obviously, a trend exists. Violation is increased in direct relationship to the status of early major industrial developments in the Eastern Powder River Basin. As these developments entered into the construction phase, and their individual and cumulative work forces peaked, wildlife-related violations increased. As these developments passed from the construction phase into the operational phase, and work forces declined, wildlife related violations decreased [illegible] to a level [illegible] above the 1975 level. This trend [illegible] in the Sheridan-Gillette District, or [illegible] the number of wildlife violators in an area is not simply a function of the number of people in an

Mr. Dick Hartman
October 24, 1983
Page 2

area. It also reflects the access those people have to the wildlife resource, and the demographic, sociological and psychological characteristics of the human population involved. Therefore, we do not agree with the interpretation of the data presented in this study, as stated. In our experience, we can expect an increase in wildlife-related violations in the Cheyenne-Laramie area very similar to that noted in the Sheridan-Gillette area (District III) in the late 1970's. An increase of 75 percent was noted in District III between 1975 and 1978. We would
1451 expect a similar increase at Cheyenne, with a gradual decline as construction activities tapered off. As noted above, we would not expect wildlife-related violations to decline to pre-construction levels, but to stabilize at a level 30-40 percent above the current level. As a result, we believe that additional wildlife law enforcement personnel are not only needed, but vital to the management of wildlife in this area. At this time, we have only one game warden permanently assigned in Laramie County, or 1 warden per 69,400 people. Since the *statewide average is 1 wildlife law enforcement officer per 6,000 - 7,000 people*, it should be obvious that our ability to enforce wildlife-related laws in this area is already seriously overtaxed. The addition of an immigrant population of 2,000 - 4,800 people between 1985 and 1989, and the associated increase in wildlife-related violations, will create impacts which will further tax Department resources both in Laramie County and elsewhere. We believe that funding for additional law enforcement personnel should be a part of mitigation for these impacts.

Through participation in the workshops of May 24, 25, 26, 1983, by the Air Force and their primary consultant, we recommended that studies be included to determine where the people of the Cheyenne area including the anticipated population increase attributable to the MX project, would hunt and fish in order that the impacts to Game and Fish Department Programs can be determined. There is no indication in the socioeconomic study that this information was acquired.

1243 We recommend that the data and methodology used to support the conclusion "*that no increase in the level of Game and Fish law enforcement is recommended*" be provided. We also noted the following errors in the data presented.

Mr. Dick Hartman
October 24, 1983
Page 3

1237 1. Page 10-20. We question the fishing use figures on Springer. Springer Reservoir was dry two years in a row because of prior irrigation rights and demands for water (1978 & 1979), killing all fish present, including the carp. The only fish that are in the reservoir now are fish that have migrated through the fill ditch, mostly carp and suckers. Bump Sullivan, which cannot be completely drained, gets between 200 and 300 fishing days each year. Total use figures for Springer are still about 15,000 user days, comprised primarily of boaters, waterskiers, swimmers, etc.

2. Page 10-23. Hunter use on Springer is 4625 instead of 1925. This is using the Springer special pheasant hunt use data (18 day season, 150 hunters per day average, totals 2700 hunter days).

Please forward these comments to the Department of the Air Force and contact us if we may be of further help.

Sincerely,

Francis Petera

FRANCIS PETERA
ASSISTANT DIRECTOR
OPERATIONS
WYOMING GAME AND FISH

FP:BDH:blg
cc: Game Division
Fish Division
R&D Division

135

THE GEOLOGICAL SURVEY OF WYOMING
UNIVERSITY OF WYOMING
BOX 3008, UNIVERSITY STATION
LARAMIE, WYOMING 82071

MEMORANDUM

To: Dick Hartman, State Planning Coordinator
From: Gary B. Glass, State Geologist
Subject: Peacekeeper in Minuteman Silos Impact Study
Date: September 29, 1983

1 Pursuant to Governor Herschler's request, we have reviewed the Peacekeeper Impact Study. We do not, however, have any pertinent comments on the study.

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

EXECUTIVE DEPARTMENT

Office of Industrial Siting Administration

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October 13, 1983

Dick Hartman
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2320 Capitol Avenue
Cheyenne, WY 82002

Re: Wyoming and Nebraska Socioeconomic Impact Study

Dear Dick:

The Industrial Siting Administration Staff has the following comments regarding the Air Force's "Wyoming and Nebraska Socioeconomic Impact Study" for Peacekeeper in Minuteman silos:

1.0 SUMMARY OF THE STUDY

1.3.1 Regional Economics and Population (p.1-7)

279 The conclusion that $270 million per year could be added to the area's economy is unsupported within the remainder of the document. If positive economic benefits for the project are to be claimed in the summary, then documentation should be provided.

269 The statement that ". . . there are no adverse impacts resulting from the in-migrant population per se . . . . ." is unfounded and unsupported by the documentation in the remainder of the study. There are numerous instances cited within this study where impacts are expected due to increased population. The statement that the principal impact will be in the labor market where some job-seeking migrants will remain unemployed due to an oversupply of workers in the market totally neglects the economic effects in the job market of the downturn at the completion of construction.

1.3.11.3 Resource-Based Recreation (p.1-11)

1245 The summary statement " . . . generally no major change in the quality of the recreational experience at any of the sites is expected" is not supported based upon the conclusions drawn within the study.

1.3.15 Beneficial Effects of the Project (p.1-15)

291 A permanent increase of nearly 650 new jobs is listed as a benefit. This statement should be qualified by stating that 404 of these new jobs will be military personnel and not available to local hires.

2.0 AREA ECONOMY AND POPULATION

2.1 COST AND SCHEDULE (p.2-1)

304 In order to accurately calculate impact assistance payments attributable to the project, an estimate of the 90 percent completion date should be provided in this section. This information is necessary for the Fiscal Impact Analysis (FIA).

2.1.2.2 Labor (p.2-1)

289 Manpower estimates by year are given in Table 2.1.2-2. Industrial Siting Regulations specifically require construction employment estimates in bimonthly intervals. In discussions with the Air Force Regional Civil Engineer (AFRCE) personnel, it was agreed that quarterly figures would be acceptable in this case since that was all that was available. At a minimum, quarterly employment estimates should be provided for the entire construction period with an estimate of peak-month employment provided. Table 2.1.2-2 is based upon estimates of average quarter employment. Average quarter employment should be defined and the method for compiling average quarters into yearly figures described. Table 2.1.2-3 gives peak-year (1985) construction worker employment by craft. The 294 total of 995 given in this table does not correlate with the number of construction workers shown for 1985 on Table 2.1.2-2 under the categories of deployment area construction, defense access roads, and F.E. Warren AFB construction.

294 Table 2.1.2-4 lists peak-year (1987) employment for assembly and check-out A&CO workers. The figures given in this table total 957 A&CO workers. From Table 2.1.2-2, A&CO and SATAF totals 915 for 1987. Thus, one would conclude that in 1987 there will be 258 SATAF employees. Is this conclusion correct? Are all SATAF workers military? A review of the crafts required for A&CO workers indicates that only one-third of these workers would generally be available within the local labor pool. Therefore, accurate projections of the 295 source of labor for A&CO workers would best be made by separating this category into two types of workers. Those that can be recruited locally should be determined by appropriate labor supply modeling techniques. The remainder should be considered in-migrants with an exogenous input to the model.

2.1.3 Estimated Use and Sales Tax Base (p.2-6)

281 A definition of materials considered to be construction materials purchased by contractors should be provided. A table should also be provided to show for each type of material the volume required, the cost, and the location from which 282 the material is procured.

303 Table 2.1.3-2 lists the use tax base for materials by county and year. The expenditures listed here for materials do not correlate with the employment schedule. For example only $7 million worth of materials are shown to be used in Laramie County in 1984 when the construction employment is only 168 workers. Sixteen million dollars worth of materials are shown for Banner County, Nebraska in 1985 and 1986 when little activity is scheduled for that area in those years.

2.1.4 Schedule (p.2-6)

301 Road construction and earthwork modifications at launch facilities and upgrading of launch facility access roads is scheduled to commence in January, 1985. This appears to be an unreasonable construction start date given climatic conditions in the area. The effect on scheduling, and hence manpower requirements, of delaying the January start date until the more normal spring construction season should be discussed.

2.2 REGIONAL ECONOMIC DESCRIPTION

2.2.1 General Economy (p.2-10 to 2-15)

277 Personal income information, including future projections for Laramie County, as well as project specific information, is not included in the document. This should be presented in a summary table that includes future total personal income in Laramie County, annual income accruing to various categories of employees on the project by year, military incomes, and induced income related to the project.

2.2.1.3 Project Impacts (p.2-12)

Problems with the economic model and labor supply forecasting have been discussed separately in a different memo. Those comments will not be repeated here.

280 Table 2.2.1-2 shows total jobs, local and regional hires, and in-migration for the project area. The figures are meaningless in the aggregate and should be disaggregated to the County level for review purposes. The source of weekly commuters should be described. It is assumed that the local hires category also includes "daily commuter." If this is the case, daily commuters should also be listed separately. The projection for in-migrant workers should also be disaggregated by type. Specifically, direct and indirect workers should be listed separately with direct workers broken down by the various categories of employment. The number of indirect workers associated with the permanent employment for the project from 1991 and on appears unreasonably low. For example, using multipliers utilized on page 3-97 to calculate baseline indirect workers generated by military and civilian employees on the base, 928 total jobs would be expected in 1991 and on. This is compared to 633 shown on this table.

2.3 REGIONAL POPULATION DESCRIPTION

2.3.3 Project Impacts (p.2-19 to 2-23)

The discussion on page 2-20 of in-migrant labor force from places such as Sheridan and Rock Springs is confusing and impossible to decipher. The text seems to say that all of these workers are considered weekly commuters. If this

is the case, we would disagree with these assumptions. Terms utilized should be defined and assumptions stated. Comparison of Table 2.3.3-1, Location of Seasonal Peak Weekly Commuters with Table 2.3.3-2, Projected In-Migration Population Allocation indicates problems with the spatial allocation of workers within the region. For example, for Wheatland weekly commuters are projected in 1986 to total 84 and 0 in 1987. On the other hand, temporary residents in
280 Wheatland are 0 in 1986 and 92 in 1987. This transposition of workers by category from one year to the next is highly unlikely. Similar anomalies appear for Torrington and Cheyenne, but are not as profound as the Wheatland example. The population allocation to communities appears to ignore weekly commuters. This is a serious oversight since weekly commuters spend the majority of the time in the community where they work and place significant demands for services in those communities.

Problems with the modeling technique aside, the data derived is very poorly presented. Total impact on an individual community, by type of worker, cannot be derived from the information presented. Employment should be presented by category of worker by year for each community significantly impacted.
260 Population increases expected with each category of worker by year for each community should also be tabulated. For Laramie County, this information should be further disaggregated into the specific study areas (Cheyenne, South Cheyenne Water and Sewer District, unincorporated county, and F.E. Warren AFB). Peak population during the peak employment month should also be presented. To assist in the analysis of later sections, households and numbers of school-age children should also be presented for each category of worker.

For Laramie County, employment will actually consist of two separate workforces. Construction will be initiated by construction of support facilities at F.E. Warren utilizing principally common construction crafts. This activity peaks in 1985. During the downturn of this construction activity, assembly and check-out work begins, peaking in Laramie County in 1986 and 1987. The make-up of this A&CO workforce will probably be extremely different than the construction workforce brought in in 1985. Thus, there will be two entirely separate construction workforces brought in at one-year intervals, each with their own

specific demographic characteristics, housing preferences, and demands for services. The study totally ignores the problem in trying to manage the impacts due to these two separate and distinct workforces.

2.4.4 Banking Mitigative Measures (pp.2-36, 2-37)

One proposed mitigative measure is that contractors could deposit a large certificate of deposit in a bank or in a group of banks at an interest rate
306 favorable to the banks. This would supposedly increase capital available for check cashing purposes. Bank deposit requirements for certificates of deposits do not in practice free up large amounts of excess cash to the bank. A more direct deposit method will be necessary to accomplish that goal.

The Air Force should work with its contractors to formulate a specific policy to
307 implement check cashing by employees. Contract language should be worked out with contractors and subcontractors to assure that some procedures are in place to assure that: (a) employees can cash checks readily, and (b) no undue burdens are placed on local banks.

3.1.1 Laramie County General Government (p.3-11)

Table 3.1.1-5 presents projected staffing requirements for Laramie County general government due to the project. Additional costs for general government
784 staff are based on a salary of $800 per month. Although this may be the base starting salary for some new employees, it is probably not an accurate assessment of the actual costs that will be incurred to add the additional necessary staff due to the project. These costs should be worked out in coordination with affected departments in Laramie County Government.

3.1.3 Criminal Justice System--County Courts (p.3-19)

This section states that staff and facilities currently serving the Laramie County court are sufficient to meet present caseloads. However, it states that
668 there is a significant backlog of cases presently being experienced, which would indicate that staff and facilities are not keeping up with demand. The analysis of future needs should be based on additions to facilities to staff currently needed as well as those required in the future. On this basis, the statement

668 that an increase in judges would not be necessary until around 1987 is probably incorrect.

3.1.3.4 Mitigative Measures (p.3-22)

Several mitigative measures are offered for consideration in the document. The
671 source of the recommendations is not clear or whether they are feasible and/or agreeable to those responsible for administration of the County Court System. These comments also relate to other discussions of City and District Courts in the document.

3.1.4.1.1 Laramie County Public Library System (pp.3-23 to 3-26)

Future needs are identified for the Laramie County Public Library System during
798 the projection period. The document should also include analysis of available funding of the library system. This discussion should include sources of funding (i.e. county general fund, special mill levies through library districts, etc.). This discussion should focus on the availability of future funds to meet identified needs.

3.2 CITY OF CHEYENNE URBAN AREA (p.3-37)

267 Baseline population projections are provided for four principal subcomponents of the Cheyenne Urban Area. Similar forecasts should be provided for the project related population, including weekly commuters.

258 The estimated population for F.E. Warren of 3,700 does not correlate with estimated base employment and military dependents of 8,580 given on p. 3-194.

3.2.1 General Government: City of Cheyenne (p.3-44)

This section states that the City is presently in the position of having to
791 vacate hangar No. 101, a significant portion of that floor space that is available to the City. The document also states that at least 4 new buildings will be required to replace that space. There is no information as to the cost of these needed improvements, timing of this new construction, or location of required replacement space.

3.2.1.1.2 Staffing (p.3-37)

The text states that full-time employment for the City of Cheyenne is 480
794 persons in 1982-1983, but the total authorized labor given in Table 3.2.1-2 is shown as 511 persons. The table should indicate in which section of the study the employment for each department is analyzed. Otherwise, is is not possible to verify that all departments have been analyzed. For example, general government staff for 1983 is said to be 96, but would appear to be 148 from the authorized levels shown in Table 3.2.1-2 for those departments normally considered "general government."

3.2.1.2.3 Capital Facilities (p.3-45)

790 The basis for projected additional space required under the baseline is not provided. The source of the capacity estimate for existing space should be documented.

3.2.1.2.4 Capital Equipment

792 The conclusion that "no major change in fleet conditions is likely" is not documented and is unsupportable.

3.2.1.3.2 Staffing (p.3-45)

793 Project impacts on staffing neglect the effect of weekly commuters. This significantly understates project impacts.

3.2.1.3.3 Capital Facilities (p.3-48)

790 The multiplier of 125 sq. ft. per new employee is not documented and is low compared to both existing space allotments and other standards which have been developed.

3.2.1.3.4 Capital Equipment (p.3-48)

792 The conclusion that no increases in capital equipment inventory are required is not documented and is unsupportable.

3.2.2 Sewage Treatment (p.3-51 to 3-56)

912 The analysis assumes that the recommendations contained in the 201 Report will be implemented, yet there is no discussion relating to the availability of funds to implement this capital improvement project or to the time required to complete these improvements. Both aspects are critical factors which should be analyzed. Since funding for implementing the 201 Plan is not assured, the report should include an analysis of the effects of delaying implementation. The assumption that the 201 Plan will be funded and implemented by 1985 when significant population increases occur is extremely optimistic, and highly unlikely. If the assumption proves to be invalid, the consequences have significant effects on all other areas of analysis.

914 Again, weekly commuters have not been included in the analysis. Including these demands could significantly alter the conclusions of the analysis.

921 Disposal of sanitary wastes collected in chemical toilets at the construction site should be addressed.

3.2.2 Sewage Treatment (p.3-59)

848 A bottleneck in the wastewater collection system in Cheyenne is a 12-inch sewer line that receives a 15-inch sewer discharge from the air force base. A proposed mitigative measure is to enlarge the sewer line to 15 inches. Cost estimates and a time table for these changes should be presented.

3.2.3 Water Treatment and Distribution (p.3-62)

905 The source of water for the City of Cheyenne is not addressed at all in the WNSIS and is inadequately discussed in the ERTEC report. Specific attention should be made to short-term supply problems caused by the construction of Stage II and the resultant unavailability of Stage I diversions. The capacity of the Stage I pipeline should also be analyzed compared to the expected demand with the project.

3.2.3 Water Treatment and Distribution (p.3-69)

910 One solution offered to defer eventual treatment capacity expansion needed by the City would be to utilize wastewater to irrigate the golf course and the parade ground at F.E. Warren AFB. A discussion of the actual feasibility of this proposal should be presented including necessary treatment to wastewater before use and discussion as to whether that treatment process can be put in place in a timely fashion.

3.2.3 Water Treatment and Distribution (pp.3-62 to 3-69)

The document contains no discussion of the Stage II water Project currently underway in the City of Cheyenne. The summary of this project should be presented including implications for future water supplies for the City. The summary of cost implications to water users in Cheyenne should also be included.

3.2.3.1.2 Water Distribution (p.3-62 to 3-64)

899 Although the methodology appears to be correct, it is impossible to evaluate because population projections for the various service areas analyzed were not provided and various assumptions utilized were not stated. The conclusions on

893 page 3-64 regarding fire flow pressure do not correlate with the conclusions on page 3-92.

3.2.3.2 Project Impacts (p.3-67)

906 The population estimates utilized in these sections are not provided. However, demand estimates do not correlate with projections provided in the sewage treatment section utilizing per capita consumption figures. When demand rates are given, the corresponding population figure should also be provided. Weekly commuters should be included in demand estimates.

3.2.4 Solid Waste Disposal

3.2.4.2 Projected Baseline (p.3-71)

932 The service area included should be described and population estimates provided for that service area. The 1990 population estimate used in this section does not correlate with projections in any other section. The service area and

932 population served for the collection system and the landfill are different, and should be analyzed accordingly.

3.2.4.3 Project Impacts (p.3-72)

933 The methodology used to determine the need for additional collection routes is
929 not described. It should include analysis based upon the expected geographic location of new residents derived from the housing section. Project impacts should include weekly commuters. Projected impacts are downplayed by saying
928 that the project simply accelerates future needs. Costs of specific equipment and services as a result of the project should be provided.

3.2.5 Stormwater (p.3-74)

942 Although the existing problems with drainage are well documented by the study, potential solutions to the problem are not analyzed. More critical perhaps, the study does not address the consequences on growth of not solving the drainage problems. This is a minor problem for the baseline case, but has severe ramifications for the impact case since most of the projected housing demand is projected in areas experiencing drainage problems.

946 Actual maps of the areas analyzed under project impacts should be provided rather than just schematics. The housing included in this analysis for project
949 impacts does not correlate with projected housing on page 3-352.

945 The suggested mitigation measure of a drainage study accurately defines the scope of work which should have been undertaken in the WNSIS. Not completing this study is a serious shortcoming of the study and has severe ramifications on other areas of analysis.

3.2.6 Law Enforcement (pp.3-81 to 3-87)

637 Projections in both the baseline case and impact case are based on sworn
635 officers only, and do not include civilian support personnel. Support staff needs and related space should be projected also. Projections for vehicles are
639 based upon an undocumented ratio of total sworn officers to marked patrol vehicles. The number of vehicles in the department is twice the number of

639 marked vehicles. Projections should either be based on the ratio determined from the total number of vehicles; or preferably, patrol officers, detectives, support staff, etc. should be projected separately, and then the number of vehicles required projected based upon the vehicle needs of each category.

634 The report incorrectly states that the joint law enforcement center will be completed in 1984. Specific problems meeting project-related law enforcement needs pending completion of the new facility should be analyzed.

638 As with County law enforcement, it is incorrect to base projected law enforcement demands based upon existing service requirements for a heterogenous population. An attempt should be made to quantify the increased demand due to the specific demographic characteristics of the projected workforce.

636 Mitigative measures should include short-term options to meet project-related demands until the new law enforcement facility is completed.

3.2.6 Law Enforcement (p.3-86)

642 The document states that it is very difficult to project future staff and equipment needs for the Police Department related to demands created by construction population. Valuable information could be gained through discussion with police administrators in impacted communities in Wyoming such as Rock Springs and Gillette who have had to deal with these types of problems in the past. Following these discussions, a summary of extraordinary needs related to the construction population could be prepared.

3.2.7 Criminal Justice System (p.3-88)

670 Project impacts are not adequately analyzed. Just saying that additional staff will be needed sooner with the project than without is not adequate analysis of project impacts. Similarly, assuming that additional needs can be met through a part-time judge and expansion of court hours is not an accurate assessment of project-related needs, but rather, only one of many options to deal with impact-related needs. The decision of which option will be selected should be left to the responsible local officials, and not be made by the analyst who should be quantifying impact needs.

3.2.8 Fire Protection (pp.3-92 to 3-96)

695 Project impacts on fire protection services should be analyzed based upon expected geographical settlement patterns instead of only increased population. For example, if settlement patterns result in a need for a new substation, staffing requirements for a new substation could be significantly greater than indicated by population increase only.

3.2.9 Local Recreational Facilities (pp.3-97 to 3-120)

1213 Population estimates used to derive local service standards in Table 3.2.9-10 do not correlate with other estimates in the report.

Project impacts are estimated based upon existing service levels. This approach is totally unacceptable, since project-related population will have different demographic characteristics than the current population. The project employment will consist of three separate and distinct population groups: (1) construction workers, (2) A&CO workers, and (3) military personnel. The recreational needs of each of these groups should be analyzed separately to accurately define recreational needs. Weekly commuters also need to be included within the analysis of needs for construction workers. Recreation is a critical element of any effort to integrate immigrant population into a community without adverse social problems. Accurately assessing the demand is the first critical step in developing adequate recreation programs. The analysis contained in this study is totally inadequate.

1215 3.2.10 Transportation (pp.3-121 to 3-156)

1030 Most of the information contained in this section is depicted on maps of poor resolution. Either the resolution needs to be improved, the scale increased, or full size maps provided. The population estimates utilized in the baseline and impact projection portions of the analysis are not stated. Therefore, one cannot determine if traffic projections were based upon the current population figures. Were the effects of weekly commuters included in the analysis? Level of Service (LOS) categories are not defined. Therefore, it is not possible for someone who is not a traffic engineer to reach any conclusions from the projected changes in categories. The study should include an analysis of the

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consequences of the predicted LOS reductions shown in Table 3.2.10-5. Improvements needed to prevent these reductions should also be described. The analysis appears to neglect transport of materials from local procurement centers to the job site. These effects should be analyzed in terms of traffic levels and physical condition of roadways.

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3.2.10.2 Public Transit (p.3-156 to 3-159)

More analysis is needed of the potential of providing mass transit for the project-related workforce. This analysis should be based upon the expected settlement patterns of project workers and job assignment areas. Particular attention needs to be given to the shifting work area of deployment area workers. The analysis should include estimated demand if mass transit is provided, the cost of providing the service, and an economic analysis of the ability of private providers to provide this service without special incentives. If this analysis indicates mass transit is feasible, the transportation analysis should be conducted assuming an effective mass transit program to determine if transportation impacts could be reduced significanly.

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3.2.10.4 Railroads (p.3-162 to 3-165)

The analysis does not present any estimates of the volume of rail traffic attributable to the shipment of materials and missile components. Therefore, the conclusion that the project will have negligible impact on at-grade crossings is not supportable. Specific traffic levels should be estimated, at-grade crossings should be identified, and estimates of the length of time these crossings are blocked should be provided.

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3.2.10.5 Aviation (p.3-166 to p 3-189)

1066 The analysis assumes that project-related operations will be spaced over the day rather than at peak hours, and hence, should not pose any problems to runway capacity. Since the project-related hourly peak approximately equals the lowest hourly peak capacity, and approaches many of the other hourly peak capacities, dismissing project-related impacts in this manner is unacceptable. The requirement to provide additional apron space should be quantified and costs 1069 should be estimated. The feasibility of providing this space given existing use patterns at the airport should also be discussed.

3.3 SOUTH CHEYENNE (p.3-190)

956 The cursory treatment given to the analysis for South Cheyenne is totally inadequate considering that 60 percent of project-related population influx is projected to reside in this area.

For the most part, the analysis contained within this section contains insufficient information to even comment on. Therefore, the lack of a section specific comment should not be deemed to imply acceptance of that section.

3.3.4 Solid Waste Disposal (p.3-190a)

Private haulers currently collect solid wastes in south Cheyenne. Under the projected baseline, it is assumed that private haulers would expand services as demand expands. This may very well be true given the moderate growth projected in the baseline analysis. Under project impacts, however, the study simply 936 references the analysis of the City's collection system. No analysis is provided of the ability or willingness of private haulers to expand rapidly to a potential temporary demand. Mitigative measures are also referenced to the appropriate section of Cheyenne. Given the difference in collection method, specific mitigative measures for south Cheyenne should be considered.

No analysis is presented of the impact of project-related growth in south Cheyenne on the city landfill. Since the analysis of project impacts on the city landfill in Section 3.2.4.3 did not provide population utilized, it is 937 impossible to determine if the effects of the population growth in south Cheyenne have been appropriately considered.

3.3.5 Stormwater (p.3-191)

953 Since south Cheyenne is an unincorporated area of Laramie County, different solutions to the drainage problems may be required due to the differences in governmental structure. A specific analysis of drainage problems and their effects on growth in south Cheyenne should be completed.

3.3.8 Local Recreational Facilities (p.3-192)

1230 Given the current deficiencies in both park land and recreational facilities in the south Cheyenne area, and the influx of additional people projected for the area, more specific analysis of project impacts should be completed. Because of the problem correlating population projections contained in Section 3.2.9 with other projections in the study, it is not possible to determine if the recreation needs of the population increase in south Cheyenne have been adequately analyzed. Mitigative measures proposed for the City of Cheyenne recreation facilities may not be appropriate to south Cheyenne. Therefore, more 1231 analysis of possible mitigation should be included.

3.4 F.E. WARREN AFB

3.4.1 F.E. Warren AFB--Economic Effects on the Community (pp.3-194 to 3-198)

This section calculates income effects of the Base on the local Community. All data presented is based on a survey by Gunther dated 1982 provided by the office 100 of Comptroller, F.E. Warren AFB. Assumptions used in this study should be presented, including source of data used, location of bases from which data was gathered, and time frame of the study.

3.4.4 Human Services (pp.3-201 to 3-203)

The study concludes that at present, there are difficulties in both caseload and service provisions to military dependents in the area of human services. Should base population increase in the future, the situation will be exacerbated unless more service staff are provided and the community service agencies increase their resources to deal with additional military dependents. The study 755 concludes that project impacts will result in conditions similar to those cited under the projected baseline. With these conclusions, it is inexcusable that no mitigative measures are suggested. Not only is this an area where the Air Force is directly responsible for providing service to the military dependents, but it is also an area where shortfalls in the provision of services by the Air Force will increase caseload and service provision demands for human service agencies in Laramie County.

3.4.5 Health Care (pp.3-203 to 3-205)

707 The conclusion that health care facilities on the base will be adequate is predicated upon approval of an expansion plan sent to the Air Force Health Facility Office. Under Project Impact, it is concluded that if the requested improvements are not implemented, the occupancy rate at the hospital will probably increase, and may affect the quality of health care provision under peak conditions. Under Mitigative Measures, however, it is concluded that there are no significant impacts to hospital facilities at the base, and therefore no specific mitigative measures are recommended. This conclusion is only valid if the expansion program is authorized. Therefore, an appropriate mitigative measure would be for the Air Force to take the necessary measures to insure that the expansion plan is approved and implemented in a timely fashion.

3.4.7 Recreational Facilities (pp.3-209)

1235 Project impacts are assessed based upon 475 workers plus dependents. This does not appear to include SAFAF workers and their dependents, which could be a significant number of people if Table 2.1.2-4 has been correctly interpreted to mean there will be 258 SAFAF employees as previously discussed. This section should also contain discussion on the use of City-provided recreational facilities and services by base personnel. It would appear that if no mitigative measures are implemented as suggested, that some of the demand for recreational facilities and services will be transferred to programs sponsored by the City.

3.5 TOWN OF PINE BLUFFS

3.5.3 Water Treatment and Distribution (pp.3-215 to 3-216)

909 The study recognizes existing high per capita demands for water based upon both the average-and peak-day demands. The study then concludes that these high per capita demands, which are based upon actual consumption data, are questionable. It then assumes that future water use will become more normal, or about 250 gallons per capita per day, and concludes that the amount of water demanded by the population increase associated with the project based upon this per capita figure represents minimal increase in flow. This cavalier dismissal of actual

909 consumption data, and the substitution of "textbook" per capita consumption figures is inexcusable. Consumption rates in the range experienced in Pine Bluffs are not abnormal for small rural communities in Wyoming with unmetered systems. High consumption can usually be attributed to either poor distribution systems or extensive irrigation with "city water." Neither of these uses will result in increased sewage flow, which is the reason stated in the report for disregarding actual consumption data.

3.8.1 Laramie County School District No. 1 (pp.3-224 to 3-244)

621 To properly analyze the effects on the cluster elementary schools, a map showing the boundaries of each cluster school should be provided. On page 3-231, it is stated that because of diverse building structures in the elementary schools, service areas which include kitchens, restrooms, mechanical areas, etc., were

608 not included in the analysis Does this mean that the projected space requirements for elementary schools are based upon classroom space requirements only and do not include support areas?

616 Baseline projections of students were made utilizing the Wyoming State Department of Education model. Project impacts, however, were projected using age cohort survival projections. Before two separate methods of projecting needs are utilized to arrive at total need, analysis should be conducted to demonstrate that the two different methods result in compatible projections.

609 Under project impacts, significant new space requirements are forecast at the elementary level. The report concludes that this need for space represents a space shortage during impact years. Rather than considering needs as a shortage, the analysis should project demands by type and location and provide estimated costs for providing required space.

604 Significant new demands for staff are projected due to the project. The absolute number of staff required, however, is difficult to determine from the report since projections contained in the text on page 3-240 state a need for 62 certified staff and 24 non-certified staff in one paragraph, and then 86 certified and 52 non-certified staff in the following paragraph where the projected staff figures were adjusted by 80 percent to allow for base number of

604 personnel. To allow for proper planning by the School District to meet project impacts, projections of additional staff requirements should be provided by grade level by year for the the project impacts. Non-certified staff requirements should also be projected based upon the various categories of employment in non-certified staff. These projections should be based upon specific analysis of project impacts on the School District. For example, bus driver requirements should not be projected solely on the basis of a per student per bus driver ratio. Rather, the specific busing requirements for project-related students should be determined, and the appropriate number of bus drivers derived from this information.

625 The report recognizes the transient children may require disproportionately higher special education and remedial instruction. The report also recognizes that the greatest space need currently in the elementary school system is in special instruction. The report concludes that special education enrollment will increase without providing any analysis of the amount of increase or how the increased enrollment can be accommodated giving existing space shortages.

628 Significant enrollment due to the project in excess of existing capacity is projected at all levels of instruction for the school district. No analysis of how these needs is met can be provided. The report should contain a specific analysis detailing the required location of new school facilities, busing requirements, costs, and so forth. The study conducts a gross estimate of the impact on elementary schools in the south Cheyenne area. This estimate is based

617 upon a projection that approximately 45 percent of the in-migrant population will live in south Cheyenne. This assumption is different than the assumption contained on page 3-190 that 60 percent of the in-migrant population will reside in south Cheyenne. The gross estimate of new students in the south Cheyenne area is derived by assuming that if 45 percent of the population will reside in south Cheyenne, then 45 percent of the projected school enrollments will come from the south Cheyenne area. However, the workers projected to reside in south Cheyenne will undoubtedly have different demographic characteristics than the workforce as a whole. The demographic and economic characteristics of the workforce used to derive population projections and geographical location within

617 the community should be utilized to analyze impacts upon the various elementary schools.

612 The measures offered under mitigative measures should be quantified as to the amount of space needed, the timing of required demand, and the cost.

3.9.1 Laramie County Fire District No. 1 (pp.3-253 to 3-256)

695 Population projections utilized to project increases in demand for Laramie County Fire District No. 1 due to the project should be shown. Before projections can be based upon per capita ratios only, an analysis of the geographic area in relationship to existing stations should be conducted to determine if a station at a new location is required. An entirely new station would require more personnel and equipment than just an addition to an existing station.

3.10.1 Human Services (p.3-266 to 3-307)

739 The most critical methodological deficiency is considering only impacts on human service agencies and not impacts on local residents. Generally speaking, the primary impacts are on residents; secondary impacts are on human service agencies. Only when people are hurting (primary impacts) will they turn to human service agencies and stimulate the secondary impacts the Air Force has chosen to study. To limit baseline data collection to secondary impacts on human services is not only misguided, but also irresponsible and dangerous economically, socially, and psychologically.

To provide a concrete example of significant deficiencies built into this approach, we merely look up the road to Wheatland and learn from their impact experience. In Wheatland human service impacts were assessed and monitored.

Impacts on Wheatland residents were not assessed or monitored. The consequences were as follows:

During the peak of Wheatland's impact, 3.5 percent of the residents were using the mental health center. Simultaneously, the most valid and reliable research done to date in a boomtown demonstrated that 36 percent of the adults in the community needed mental health services. Reliance on data only from the mental health center underestimates the problems experienced by residents by greater than 10 to 1. An even greater misrepresentation of the true impacts on Wheatland were revealed with alcohol abuse. Only one in every 48 men admitting to an alcohol problem sought treatment at the mental health center from which local services were available. The human service method of assessing impacts was grossly inaccurate. This method underestimated problems in the community by 10 and 48 times, respectively, in these two examples.

The consequences of these extremely high rates of problems are largely unknown, but they can be assumed to have significant longterm negative impacts on the community. Some consequences are starting to become apparent. It has been over two years since Wheatland experienced its bust. Despite the major losses in population, the mental health center caseload has steadily increased to more than double the peak impact caseloads. The extremely high rates of "hidden" human problems documented during the peak of impact are apparently now stimulating a secondary impact on the mental health center. No one knows what additional problems still lie under the surface in Wheatland, but certainly there must be some, as the extent and severity of problems documented among the residents during Wheatland's impact would not be expected to simply disappear. More hidden problems may yet surface in Wheatland.

Unfortunately, Wheatland had only human service data from which to understand their impacts. The human service data, although of good quality, simply could not "see" the primary impacts on the residents and the extent of problems that existed.

The approach that would have solved Wheatland's dilemma, but which the Air Force has also not chosen, is to assess and monitor impacts directly on local residents. Especially important is to gather baseline data directly from residents in those areas which consistently show impacts (i.e. mental health problems, alcohol abuse, crime, youth, and family problems). With such data, Wheatland would have been able to identify potential problems in these areas before impact occurred and to monitor changes in these critical areas throughout the boom and bust periods. This would have enabled the human service sector to recognize and choose timely and cost-effective programs to address the community's changing needs. Justification for prevention/mitigation funding requests would have been available and in "hard data" form.

The bottom line on what we can learn from Wheatland's impact experience is that human service data, although necessary, is simply inadequate for the

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identification, planning, funding justification, and mitigation of human impacts throughout the boom-bust cycle. Direct assessment and monitoring of residents is also necessary.

The WNSIS projections of impact are based on an assumption that population growth is the only variable related to staffing needs. An equation to represent this simplistic means of projecting impacts is as follows:

Impact Projections for human service staffing = Present Staff/Client Ratio X Percent Population Change

This approach to impact projections for human services is clearly dated and inappropriate relative to current knowledge in this field.

A more accurate and appropriate equation for projections of human impacts would include the following variables:

Impact Projections for human service staffing = Present Staff/Client Ratio X Percent Population Change X

Percent Boom Impact Change X Percent Bust Impact Change X

Percent Change due to Prevention Efforts X Percent Change Due to Unmet Needs

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This proposed equation is justifiable in terms of the boom and bust literature, whereas the WNSIS equation is not.

The following is a brief explanation of each variable in this latter equation and how they reveal deficiencies in the WNSIS approach to human service projections.

1. The first variable is the present staff/client ratio. The initial question to ask in this area is whether the baseline staff/client ratio is accurate. If it is not accurate (as is the case in the WNSIS document with several agencies described as having fewer staff than are actually present), projected needs for staff will be wrong in all future estimates. If the baseline number of staff is low, as occurs in this case, then future staff projections will be low, resulting in $100,000s of probable funding deficiencies.

The second question to ask is whether present staff/client ratios are adequate to meet the present service needs. If they are excessive, then more staff than needed will be projected. If they are deficient, then less staff

than needed will be projected. In our situation, several agencies are reported to have too few staff to meet present client needs adequately. Again, this can result in huge funding deficits, as too few staff positions are projected relative to future needs. To make projections based on a staff/client ratio which is already inadequate to serve residents' needs would likely lead to a continually overworked staff and low quality of services. Low productivity and high staff turnover would likely follow and result in additional costs which were not projected.

The answer may be to determine whether staffing patterns are adequate at present. If, for example, more staff are presently needed, local funding sources should be responsible for those present deficits. The Air Force should only be responsible for the staff increases their project stimulates. But adequate staffing is critical for Cheyenne as well as the Air Force, to provide the quality services needed to protect our citizens and their workers throughout the impacts.

2. The second variable, percent population change, must be as accurate as possible, for obvious reasons.

3. The well-documented psychological and social boom impacts on residents of rapid growth Rocky Mountain communities are not included in any WNSIS staff projections. This deficiency will likely result in severe staff shortages in a number of human service agencies and huge deficits in funding projections.

4. Bust impacts similarly were not taken into account. High rates of the same types of human problems seen in rapid growth situations (i.e., mental health, alcohol abuse, crime, and family disruptions) have been documented in bust situations.

5. Prevention programs to address the social and psychological problems are only minimally mentioned. This represents another unfortunate oversight because prevention programs are our best alternative to minimize the boom and bust situations.

6. The last variable recommended to improve human service impact projections is to identify residents unmet needs and their expectations of human service providers. The direct identification and monitoring of high-risk groups among local residents would allow more accurate projections of future service needs. The identification of residents' expectations for services would further refine projections of service use, as well as offer the opportunity to improve service delivery.

In summary, the WNSIS impact projections for human service staffing are deflated for the following reasons:

1. Present staff/client ratios are inaccurate (too low) in some instances. Present staff/client ratios are inadequate to meet current needs in several agencies. Projections of future staff requirements are deflated in each case.

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2. Population projections, including demographic breakdowns, need to be as accurate as possible.

3. Boom social/psychological impacts must be considered. They are not in the WNSIS document.

4. Bust social/psychological impacts must be considered. They are not in the WNSIS document.

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5. Prevention programs are critical to minimize boom and bust human impacts. They are typically not considered in the WNSIS report.

6. Finally, unmet needs of residents are important to identify in order to: a) make more accurate projections, b) prevent and mitigate human problems effectively, and c) minimize both boom and bust impacts on our residents and our local quality of life.

3.10.1.4.1 Department of Public Assistance and Social Services (DPASS) (pp.3-268 to 3-273)

The analysis of human services demands by the project is a very gross oversimplification of human service problems experienced in rapid growth situations. Because a number of agencies are involved, the staff and space needs of each individual agency is considered by the study to be small, but in a cumulative sense, the total impact is significant. This is particularly true because many of the agencies may very well be competing for the same, limited funds. Projections appear to be made based upon existing service levels. The

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in-migrating population will undoubtedly place higher demands on human service agencies than the existing, stable population. Funding sources, which may be a

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problem, are not adequately described in the study. The source of funds for all agencies should be discussed, and particular emphasis placed upon the effect of reduction and availability of federal grant programs due to reduction in federal human service programs.

Although the total area of the DPASS facility is given, no description of the

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facility is provided. This facility should be included within the selected Facilities Condition and Capacity Survey.

The report concludes that clientele needs with the project are not anticipated

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to be different from the needs of current DPASS users. No basis for this conclusion is provided. General trends of some of the programs under impact

734 conditions are given. No specific analysis of demand has been provided, however. Specific demands on DPASS services should be estimated based upon recent experience in other impacted communities. Specific attention should be
736 given to impacts during the end of the project when workers are being laid off. The report concludes that the possibility that some persons would move in because of the project and later require income assistance beyond short term emergency aid is considered small. This conclusion is unsubstantiated and is not supportable.

3.10.1.4.8 Community Center on Domestic Violence and Grandma's Safe House (pp.3-293 to 3-292)

Project impacts appear to be projected upon existing per capita use rates. The possibility that the new population will have a higher use rate is recognized, but no attempt is made to increase the projected demands due to the expected
734 higher usage rate. More specific analysis of impacts should be attempted based upon experiences in other communities. A number of potential unmet needs are noted in the baseline description. The project impact section, however, contains no discussion of how the population growth related to the project will aggravate these current shortages.

3.10.2 Health Care (pp. 3-308 to 3-321)

The baseline description recognizes that hospitals in Laramie County have a service area which encompasses portions of southeastern Wyoming, southwestern Nebraska, and northern Colorado. Projections for hospital facilities and personnel, however, are based only on population projections for Laramie County. Therefore, demand for facilities and personnel is probably understated, particularly for the project impact since most of the population increase
701 forecast due to the project outside of Laramie County is, in fact, within the service area of these hospitals.

705 Project impacts appeared to be assessed using existing per capita rates. This may underestimate the demand on the obstetrics unit at Memorial County Hospital given the different demographic characteristics of the in-migrating population compared to the population for the County.

703 The specific need to provide emergency medical transfer capabilities at staging areas is recognized under mitigative measures. This need is not translated, however, into increased demands on emergency medical services. The report recognizes that there is a need for a heliport for emergency air transport due to the dispersed nature of the construction in the deployment area. This need is probably much more acute with the project. Specific emergency medical transfer requirements at the deployment area should be estimated.

706 Under mitigative measures, the report concludes that consideration should also be given to the monitoring of demographic characteristics of in-migrant populations in order to adjust available services to the extent possible particularly during the construction period. This is exactly the type of information that should be provided within the analysis to make sure the facilities and services will be available when required. Monitoring should then be conducted to make adjustments as necessary. Projections not based upon the expected demographic characteristics of the in-migrant population are not valid.

3.10.3 Housing Resources (pp.3-322 to 3-357)

371 In the baseline descriptions of mobile home parks, proposed development of new parks is discussed. A major mobile home park development is described to include 500 spaces located in, and serviced by, the City of Cheyenne. If this park is developed as assumed in the Housing Analysis, then the assumptions regarding geographical location of in-migrating families in south Cheyenne Water and Sewer District would appear to be erroneous. More information should be provided on the current status and probability of development of this major new park.

363 *The Housing Analysis provides a brief inventory of hotel and motel spaces* available using average summer occupancy rates, presumably to determine vacancies available for use by construction workers. Since summer occupancy rates peak at 100 percent, the use of hotels and motels for construction worker housing would have adverse consequences on the tourist industry in the area. These effects should be considered before assuming that housing for construction workers is available through the use of hotels and motels.

378 Campgrounds in the area are inventoried only by name and number of spaces. Most of these campgrounds are undoubtedly just that, facilities suitable for overnight accommodations by tourists. *Before it can be assumed that spaces* would be available for construction workers for recreational vehicle (RV) parking on a longterm basis, the campgrounds should be surveyed to determine amenities offered. To be acceptable for RV parking by construction workers, campground facilities should include shower houses, laundry facilities, adequate playgrounds, adequate storage space for additional vehicles and recreation equipment such as boats, snowmobiles, and so forth.

337 The number of projected dwelling units required under the baseline condition is estimated based upon a constant multiplier of household size. Given the sociological changes being experienced in the population as a whole, this assumption of constant household size is not acceptable. The baseline housing supply is projected to increase at a nearly constant rate per year through the planning period. The use of this constant rate maintains the current vacancy rate above the frictional vacancy rate. It is not likely that builders would
336 continue to construct more housing than is needed on a year-to-year basis. The net effect of projecting continued vacancies in the baseline case is to reduce the net impact forecast with the project.

339 In the analysis of project impacts, insufficient information is provided on the net vacancy rate, total vacancy rates projected, and frictional vacancy rates to adequately analyze the projections. Nevertheless, analysis of the results leads one to conclude that errors in the analysis are significant. For example, it is inconceivable to believe that multi-family units will have a net vacancy rate resulting in a net demand of only eight units in 1986, the peak year of impact for construction worker population. Within the projections, the "other category" is defined as motel/hotel and campground facilities. Although it is not possible to determine exactly how these projections were derived, they are grossly in error. For example, in 1988 only 344 units of this type are projected to be demanded. In 1985, however, 1,697 weekly commuters are projected for the Cheyenne area. Weekly commuters obviously demand this type of temporary accommodations. Therefore, it is obvious that the demand for this type of housing unit is grossly underestimated.

339 Review of the housing methodology and assumptions presented in Appendix A reveals some of the reasons for problems with the projections. For example, housing distributions are projected to remain constant through all project years. This is not a realistic assumption given the influx of construction workers with different types of housing demands than the current population. Vacancy rates for various communities are given in Table A.3-1. For the Cheyenne urbanized area, the footnote states that vacancy rates are not vacancy rates. This statement obviously needs clarified.

338 Table A.3-4 presents the assumptions for housing allocation by type for construction, assembly and checkout, and weekly commuters. Using the same assumptions for these three different and distinct categories of workers is not acceptable. The percentages for each type of unit demanded for these workers also does not appear to realistic. For example, it is difficult to believe that 16 percent of the assembly and checkout workers will reside in hotels, motels, or recreational vehicles. It is also equally difficult to believe that 60 pe-cent of the unaccompanied (single-status worker) will reside in mobile homes.

Housing allocation by type for military operations, civilian operations, and indirects are provided in Table A.3-5. Again, these three separate and distinct categories of workers cannot be expected to have the same type housing demands. Assumptions regarding types of units demanded again are difficult to believe. For example, the assumption that 20 percent of these unaccompanied workers would reside in hotels, motels, or campgrounds is not supportable. Table A.3-6 lists the assumed housing occupancy for workers by type. The assumptions in this table indicate a much higher percentage of shared housing units by workers for the unaccompanied workforce than can be expected.

383 On page A-51, the housing allocations are assumed for the urbanized area under project conditions by housing type and census track number. A map of the census tracts should be provided.

340 In the section on mitigative measures for housing, the conclusion is made that the mitigation of housing impacts caused by the project would require that housing be made available in a timely, affordable, and quality fashion. We

agree thoroughly with this conclusion. However, the means to accomplish this goal are not provided within the mitigative measures listed. The only way to adequately assure that this goal can be met is for the project sponsor to take an active role in the development of the necessary housing.

340 A mitigative condition proposed is the development of a temporary project worker facility to alleviate the high demand by the in-migrant and weekly commuting construction worker. We concur with this recommendation and believe that the WHSIS should contain a complete description of proposed bachelor quarters to be provided for the single-status workers. This description should include number of units, type of units offered, location, amenities, etc.

4.0 PLATTE COUNTY, WYOMING and
5.0 GOSHEN COUNTY, WYOMING

697 Because of the small population impact expected for these counties, detailed review comments will not be made on these chapters. The study does not accurately assess impacts in three critical areas, however. Demand for
633 emergency medical services (EMS) is projected based upon in-migrant population
898 increases only. The demand for EMS should be projected considering the number of workers at jobsites within the County, and not the in-migrant population.
631 Impacts on law enforcement services, particularly the Sheriff's Department, should also be assessed based upon the number of workers within the County.

772 The impacts on the county roads and the Road and Bridge Department should be
77E assessed based upon specific project demands. This would include increased
984 maintenance to defense access roads as well as damage to county roads by shipment of materials and supplies.

10.1 REGIONAL RECREATIONAL FACILITIES

Table 10.1.1-3 lists Medicine Bow National Forest sites with visitation to capacity values of 40 percent or more. Were facilities within the Pole Mountain Unit of the Forest considered in this listing? Since the Forest Service is currently unable to maintain many of its facilities and developed sites due to budget constraints, increased demands on facilities within the Pole Mountain
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1238 Unit will result in continued deterioration of facilities and services provided. These problems should be analyzed and possible mitigation measures suggested.

Sincerely,

Richard C. Moore, PE
Director

RCM/CBS/lb

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THE STATE OF WYOMING
EXECUTIVE DEPARTMENT

ED HERSCHLER
GOVERNOR

Office of Industrial Siting Administration

SUITE 560 BOYD BUILDING CHEYENNE, WYOMING 82002 TELEPHONE 307-777-7369

November 10, 1983

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Re: Peacekeeper in Minuteman Silos--Draft Environmental Impact Statement, SIN 82-149

Dear Dick:

The Industrial Siting Administration Staff has the following comments regarding the DEIS for the Peacekeeper Project:

General

64 The DEIS fails to describe existing environmental conditions adequately and is too general in its discussion of potential impacts. Where significant impacts are anticipated, the analyses should include more maps and discussion of site-specific effects, quantitation, and the logic behind conclusions presented. The level of impact and significance scheme used in the DEIS is informative but should not be used in place of detailed textural descriptions. Too often the reader is referred to a table of significance and not presented information with which to generate impressions of specific problems and their consequences.

2.1.11.2.1 Regional Recreation

That Medicine Bow National Forest consists of four separate units and is the most heavily visited area within the area of concentrated study does not inform the reader of public use patterns nor of expenditures and staffing requirements within the Forest. For example, the Pole Mountain/Vedauwoo area is probably more heavily used by Cheyenne residents than any other area within the National Forest. However, no attempt is made to describe problems, facilities, and visitor use in this area.
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2.2.1.2.3.1 Crow Creek Watershed

Here, as well as in descriptions of other watersheds, water quality should be characterized by salient chemical and physical parameters. Qualitative
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1314 descriptions such as "good" are relatively meaningless. Also, the stream bed, channel morphology, and locations and extent of important riparian zones should be described.

2.2.2.2.2.3 Non-game Mammals

1380 Because of the potential association of black-footed ferrets with prairie dog towns, this section should include the number, areal extent, and locations of such colonies likely to be affected by the project.

2.2.2.2.3.2 Biological Conditions

1390 This section tells the reader only that many species of fish are found in the region and that they occur where they are expected to occur. Questions that should be answered in this section include: locations of major lakes, rivers, and streams; which ones contain important biological resources; and where and what those resources are.

2.2.2.2.3.3 Fisheries

1391 This, like the previous section, is too general. It does not describe in detail important fisheries and their distances from Cheyenne. Where on Horsecreek, for example, does the greatest amount of fishing pressure occur? Beaver ponds in the Pole Mountain area support fisheries of significant local importance but are not mentioned.

2.2.2.2.5.2 Wildlife

1428 A question more important than what kind of habitat (i.e.: lakes, rivers, etc.) do bald eagles frequent is where, specifically, in the region of influence do eagles occur.

3.0 ENVIRONMENTAL CONSEQUENCES

90 Throughout this Chapter, potential mitigation measures that will be considered are identified and, in most instances, the DEIS indicates that one, some, or all of the mitigation measures identified for each resource area may ultimately be selected. From the reader's standpoint, identification of mitigation measures that may or may not be implemented is meaningless, especially since the basis for selection of specific mitigation measures is not indicated. The final EIS should be more precise respecting what mitigation measures will be employed, including justification for rejecting any measures identified.

3.1.3.2 Definition of Levels of Impact (Public Finance)

387 High impact is defined as when the project causes a public entity to raise fees or tax rates. This definition seems unfair when it is applied to taxes for

operating budgets, because local units of government are already taxing the legal maximum for operating purposes. Therefore, by law they cannot raise tax rates and the tax portion of the high impact definition for operating budgets is automatically precluded. 387

3.1.3.3 Determination of Significance Criteria (Public Finance)

An impact is not considered significant unless project impacts necessitate changes in existing fiscal policy including tax structures or bonded indebtedness. Also, impacts are not considered significant if they only cause reductions in service levels or temporary increases in taxes or service charges. The potential for serious significant impacts exists within the definition of significant. These criteria should be reevaluated to assess the severity of potential changes related to the Peacekeeper Project. 386

3.1.3.4 Environmental Impacts of the Proposed Action and Project Alternatives

Severence tax revenues used in the analysis are held constant over time for the City and County. This assumption does not seem realistic. Some estimate of changes in future production levels of minerals subject to severence taxes should be considered in order to derive more realistic estimates. 440

The document states that adjustments were made to reflect impact conditions when projections of revenue expenditures were done. These adjustments should be described.

3.1.3.4 Environmental Impacts of the Proposed Action and Project Alternatives

Revenues have been projected using three methods: (1) an adjusted incremental approach based upon appropriate service units of measures (per household, per unit per student or per ADM); (2) a formula based upon statutory allocation and distribution; and (3) regression equations based upon theoretically related variables and the best fit of the dependent variables to the independent variables (for sales and use tax projection). 439

The actual formulas and background data used in the projection techniques should be presented for each category of revenue. The adjusted incremental approach was apparently used for categories such as cigarette and gas taxes. There is no evidence presented that the ratio of the actual amount received to population or households is historically valid, particularly when constant dollars are used. It is doubtful that items such as cigarette taxes or gas tax have actually increased with population or households in the County or municipalities. If such a formula is to be used, it should be verified with historical data using constant dollars. 441

Sales and use tax projections are based on a regression equation which is solely based on theoretically related variables and the "best fit" of those variables. Apparently, sales and use tax receipts are postulated as a function of consumption. Since measurements of consumption are not available, personal 442

income is used as a proxy to predict future sales and use tax receipts. This theory is incorrect. Receipts are not solely a function of personal income within the County. It ignores the fact that entities other than individuals make purchases subject to sales and use taxes. Companies and government (e.g.: Herschler Building) make purchases that are subject to sales and use taxes and these are not a function of local income. The regression equation used for sales and use taxes is theoretically incorrect and should be repostulated. 443

Congress has recently approved federal revenue sharing entitlements for the next three years. Since there is no guarantee that the program will continue, they should be excluded from the subsequent years of analysis.

Expenditures per household were used as the projection unit for Laramie County and the City of Cheyenne. No evidence is presented to indicate that this is an appropriate projection technique considering the growth of households (a derived figure) within local governments and the growth of expenditure categories when controlled for constant dollars. Furthermore, this assumes that all expenditures are a function of people that reside in households and ignores the additional individuals that reside in group quarters in the community (e.g.: F.E. Warren AFB). While households may be an appropriate variable to use for some categories, it may be totally inappropriate for others. Researchers should determine which is the best predictive device and explain why. Also, we do not know which number of households is used to project what municipal service. The City of Cheyenne provides sewer and water to areas outside the legal boundaries. Whether or not this factor was included is not known. The actual numbers, formulas, and adjustments used in the projections should be presented. 444

For the proposed action, revenues and expenditures were projected in a similar manner with adjustments made to reflect impact conditions. These adjustments are not fully described and cannot be verified. The actual historical numbers, adjustments, and formulas used to project budgets in both alternatives should be presented for verification. How and where the researchers factored weekly commuters into the projections is not presented and cannot be ascertained. We are not assured that their assumptions are appropriate. For example, it appears that the researchers have netted out weekly commuters from the total number of civilian personnel required for the project, and then added the weekly commuters back in at a 4/7ths rate. Even though weekly commuters may only be physically present in the community four nights out of seven, the sewer, water, and public safety facilities for these commuters will have to be present in the community seven nights a week.

The tables on additional capital outlay and debt service do not differentiate any capital costs for Laramie County or the City of Cheyenne for the no versus proposed action alternatives. Apparently, the additional people associated with the proposed action will not cause any additional capital outlays in the City or County. We find this conclusion to be "unbelievable." Undoubtedly, the amount or size of the new capital facilities will change with the construction of the proposed action. 445

If the preceding concepts were incorporated into the fiscal analysis, one would be relatively assured that the summary of impacts and the conclusions contained therein would be changed.

3.1.3.4.1.2 Laramie County--Proposed Action
and
3.1.3.4.2.2 City of Cheyenne--Proposed Action

Impacts on the City and County include increasing taxes over a period of greater than one year as well as a deferral in construction of the planned City/County Jail Project. It is difficult to understand how impacts of this magnitude can be considered not significant. Changes of this magnitude will affect future Cheyenne residents can be considered to have significant negative effect. 385

3.1.3.4.1 Laramie County

The legal debt margin of an entity is based on total assessed valuation of that government unit. Given the higher population and increased economic activity associated with the Peacekeeper Project, the assessed value of Laramie County should be higher with the project than without, not equal as presented. Some adjustments in these figures are warranted. 398

3.1.3.6 Mitigation Measures

A proposed mitigation measure is to increase fees and license charges of City and County residents. This proposed mitigation effort could actually be considered a negative impact as it could aversely affect all City residents.

A proposed mitigation is to have all project-related purchases of supplies, materials, and equipment made by contractors rather than through Department of Defense (DOD)/Air Force Regional Civil Engineers (AFRCE) purchasing. Is this proposal consistent with current federal procurement regulations? 446

Potential reductions in expenditure levels are proposed as a mitigating effort for the City, the County, and the School District. This, too, should be considered a further impact rather than a potential mitigation strategy.

3.1.10.4.2.2 Rural Land Use

The DEIS views the possible displacement of nine residences due to the new Quantity Distance requirements for Peacekeeper as an insignificant impact. To the contrary, this is a serious impact of major concern that must be addressed as such in the final EIS. 194

3.1.10.6.2 Rural Land Use (Mitigation)

Besides the mitigation measures identified to minimize rural land use impacts, the USAF should consider the following as standard impact control measures:

1152 a. avoid entering private lands when the ground is muddy or wet;

b. prior to entering private lands for construction, maintenance, or any other purpose, the project should notify the affected landowners, their tenants, or representatives of the expected date(s) of entry;

1152 c. all trash, construction debris, and slash should be removed from easements; and

d. disturbed areas should be seeded with native plant species that are compatible with the existing uses of the land surrounding the easements. The project should commit to establishment of self-sustaining cover of the reseeded species.

3.1.11 Recreation

The DEIS has not provided justification for the assumption that the in-migrant population will recreate at the same level as current urban residents. This assumption is not consistent with what has been observed for other major projects in Wyoming; that is, construction workforces tend to be young and recreation-oriented thereby recreating at a higher rate than the average residents. The ISA disagrees with this assumption and believes the identified impacts are significantly underestimated. 1170

3.1.11.4.1.2 Proposed Action

The Pole Mountain area is within Medicine Bow National Forest. Therefore, differentiation between the Pole Mountain unit and the Medicine Bow unit should be made. That many developed areas within the Forest are below capacity much of the year is understandable since most of the year they are under snow cover. That they are below capacity much of the year also indicates that they are at or above capacity during parc of the year. When are these times and what areas are specifically affected by full capacity use? 1175

Figure 3.1.11-1 Recreation Summary Impact Matrix

The second line of this matrix is confusing. Local impacts on regional recreation are indicated. Please clarify. 1157

3.1.11.6.1 Regional Recreation (Mitigation)

Recreational facility and personnel needs resulting from project-related demands are not adequately addressed. The three State parks within the region of influence, particularly Curt Gowdy, are of major concern. Moderate and significant impacts at the three State parks are acknowledged in the DEIS. The Wyoming Recreation Commission has indicated the need for expansion of Curt Gowdy to meet project-created demands and the need for provisions to accomplish adequate law-enforcement at all three State parks. The mitigation measures identified do not directly address these needs. The final EIS should not only address these needs directly, but also should indicate appropriate mitigation. All "considered" mitigation measures should be implemented. 1178

3.2.1.4.3.2 Proposed Action

Erosion and Siltation

Where, specifically, in the Crow Creek watershed are impacts of erosion and siltation expected to originate? What distances downstream from these origins are expected to be affected?

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3.2.1.5.1 Explanation of Detailed Impact Matrix

The exact locations, extents, and consequences of impacts on the Crow Creek watershed should be described here.

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3.2.2.4 Environmental Impacts (Biological Resources)

The list of assumed mitigation measures includes the provision to increase productivity of selected areas of wildlife habitat through promotion of range improvement programs. However, in section 3.2.2.6 which lists mitigation measures to be considered, this same measure is identified again. Is this an assumed mitigation measure or one that is only under consideration?

1360

3.2.2.4 Environmental Impacts (Biological Resources)

The project-related population will significantly exacerbate cumulative impacts on game and fish law enforcement capabilities. This concern was raised by the ISA at a number of workshops and conferences over the past year, but the DEIS totally neglects to address this issue. Not only should this issue be addressed in the final EIS, but a mitigation program should also be developed in cooperation with the Wyoming Game and Fish Department.

1361

3.2.2.4.2.4 Raptors

Here, as in all sections within biological resources, the reader has no idea what the effects will be. First, which of the criteria on pages 3-233 and -234 were weighted most heavily in the conclusion that construction activity, for example, will cause significant short-term, moderate impacts on the Swainson hawk nest. Specifically, what will those impacts be? Second, to characterize all biological impacts, whether on pronghorns or sunfish, as either short-term or long-term; low, moderate, or high; and significant or non-significant, with only a minimum of discussion on the specific kinds of problems that individual populations might encounter, is too simplistic. This attempt on succinctness through a tabular approach is admirable, but should only serve to supplement a fuller discussion; it does not and should not replace longer text. The reader still wants to know what's going to happen to the 19 raptors within 1 mile of access roads and silos.

1362

3.2.2.4.3.2 Proposed Action

What is the projected increase in fishing pressure in the region of influence, and to what degree and where will this effect be noticed? What petroleum products and chemicals can be expected to be discharged into drainages in the event of accidental spills? Where is sand and gravel to be removed from perennial streams? The analysis of potential impacts from these activities is insufficient. Please explain in detail how borrow pits in perennial streams are going to improve fishing opportunities and who might be responsible for properly designing and managing these areas.

1392

3.2.2.6 Mitigation Measures

What do the fourth and sixth "mitigations" in this list mitigate?

1360

3.2.2.7 Unavoidable Adverse Impacts

All of these impacts should be quantitated, if not here, at least somewhere within the DEIS.

1363

3.2.3.4 Environmental Impacts (Soils)

This section identifies only general controls for minimizing impacts to soil resources. Neither this section nor sections on water or vegetation address impact controls for cable system crossings of streams or riparian areas. The following should be considered as standard impact control measures at stream crossings and in riparian areas:

a. timing stream crossings to avoid periods of high flows;

b. minimizing disturbances to streambeds, wetlands, and riparian zones through the restricted use of machinery;

c. locating field staging areas away from stream channels and riparian zones;

d. stabilizing streambanks as quickly as possible after disturbance; and

e. in trout spawning areas, stream crossings should be timed to avoid the period of spawning.

1378

Sincerely,

Richard C. Moore, P.E.
Director

RCM/lb

138

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Occupational Health and Safety

CHEYENNE, WYOMING 82002

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CHAIRMAN
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RON BAGBY

DONALD D OWSLEY
HEALTH AND SAFETY ADMINISTRATOR
(307) 777-7786

October 20, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Sir:

Thank you for the opportunity to review the Draft Environmental Impact Statement.

As you know this department has no jurisdiction over federal government employees nor is public health and safety within our realm. Our concern is with the health and safety of civilian contractors during the construction or refurbishment of the sites.

1

I find no problems with any of the health and safety provisions as stated in the impact statement itself.

Yours for worker health and safety,

Donald D. Owsley
Administrator

DDO:kj

139

MEMORANDUM

To: Major Walsh and Jeff Yarne

From: W. D. Nelson

Re: WASIS Comments

302	p.1-2	/1.2	Make up your mind... construction in Spring '84 or '85?
276	p.1-5	/1.2.2	What do you mean "taxable construction materials". Why only $87.5 million for WY? Construction "early" 1984. What is "early"?
691	p.1-8	/1.3.6	Fire District #2 - no impact??
700	p.1-9	/1.3.7	Laramie County Health Dept? What is that? Why does a health department need obstetric beds?
710	p.1-10	/1.3.10	Two persons for what agency(ies)?
1455	p.1-10	/1.3.11.2	Overthrust Belt experience shows direct relationship between growth and violations increase.
	p.1-13	/1.4	Add "Congress" to list of units?
292	p.1-13	/1.4.1	1st bullet- add toll free hot line for job info to reduce the number in-migrants seeking employment for jobs that are unavailable.
290	p.2-9	/2.1.5.2.2	Last sentence objectionable ... looks union busting.
9	p.2-10	/2.2	Inconsistant with p. 1-1/1.1 (Colorado coverage of report).
242	p.2-22	/2.3.4	CETA is no more!
268	entire	2.3	How valid? ranges?, What if figures wrong?
292	p.2-28	/2.3.4	Need to add some sort of toll free hot line for non-jobs.
306	p. 2-36 & 37	/ 2.4.4	Mandatory contractor deposit requirements?
252	p.3-1	/3.0	I'm very skeptical of the 68,600 - 87,638 population increase figure.
673	p.3-3	/3.1.1-1	District Attorney not County Attorney? et. seq.
779	p.3-10	/3.1.1.2.4	Why no expansion of the fleet? With construction I would anticipate that there will be more frequent rural road maintenance.

646	p.3-14/3.1.2.3	what is the methodological basis for determining impact on Sheriff's Office?
642	p.3-17	"Wilkinson study correct? but what are "serious" crimes. Pop increase yields disproportionate rise in law enforcement activity needs more analysis.
344	p.3-37/ 3.2	What is Fox Farms area?
912	p.3-61 /3.2.2.4	It is safe to assume the Banner plan will be implemented in the near future"?
647	p.3-86 /3.2.6.3	Even if Wester Research correct, "serious" crimes is not the issue ... all types of crimes present impact!
692	p.3-93 & 94 /3.2.8.2-4	No basis for projections.
229	p.3-117-120 / 3.2.9.3	No basis for projections and "mitigative measures" not very creative, comprehensive, or specific.
056	p.3-122 /fig 3.2.10-1	Yellowstone Road not marked
074	p.3-124 / last ¶	Table 3.2.10-2 does not list "5+ accident" locations as the paragraph states. Try table 3.2.10-9?
031	p.3-126 / fig 3.2.10-4	Who has designated these "potential growth areas"?
034	p. 3-147/ fig 3.2.10-18	Riner Viaduct is no more!
064	p.3-164/fig 3.2.10-26	Orient map - N = top.
063	p.3-165 / 3.2.10.4.3	What does "negligible" mean?
	p. 3-201 / 3.4.3.4	"could"change to "should".
755	p. 3-203/3.4.4.4	You have got to be kidding in view of §§3.4.4.2.
802	p.208/3.4.6.4	Is FE Warren AFB libr. going to be tied into the new state computerized network?
703	p.3-212 through 3-223	No discussion of how the MX construction activity may affect the rural volunteer ambulance services.
	p. 3-231	Next to last § typo "elementray"
629	p. 3-243/3.8.1.4	Not enough detail - esp. material in 2nd, 3rd bullet.
693	p.3-256/3.9.1.4	Funding from/by whom? Why not an annexation alternative or changing the mutual aid agreements?
720	p.3-261 et. seq.	"Dept" of PA &SS is Laramie County "office" of the Div. of PA & SS.

726	p.3-263 through 3-307 culminating in 3.10.1.6 is totally inadequate. Each section should have a mitigative measures section or the overall mitigative measures section should be in sufficient detail to figure out what impact is going to be felt. The use of 1:1 pop. increase to problem is not adequate. One of the best examples of inadequate analysis is 3.10.1.4.3.3 (p. 3-278). The methodology of projecting impacts is questionable (at best) and a piece of garbage (at worst).
734	p.3-285 through 287 / 3.10.1.4.5.3	Forcasts made on a total per capita basis are invalid and unreliable
702	p.3-310 through 3-321 esp. 3.10.2.4	not adequate at all.
597		housing, judicial system both suffer the same deficiencies.
598	Platte & Goshen counties will have impact for EMS, highways & roads, law enforcement.	

140

The State of Wyoming

ED HERSCHLER, GOVERNOR

OFFICE OF
OIL AND GAS CONSERVATION COMMISSION
STATE OIL AND GAS SUPERVISOR
133 SOUTH DURBIN
P. O. BOX 2640
CASPER

STATE OIL AND GAS SUPERVISOR
DONALD B. BASKO

October 18, 1983

Mr. Paul Cleary
State Planning Coordinator's Office
Office of the Governor
State Capitol Building
Cheyenne, WY 82002

Re: The MX Impact Document Review

Dear Mr. Cleary:

1 I apologize for missing the October 14, 1983 deadline for filing comments on the above-noted impact document. However, as I view it, there is very little impact that this will create on oil and gas activity other than perhaps the limited areas where access for drilling would be prohibited.

Oil and gas activity in the southeast part of the State is not too intense anyway, so I do not feel that this would be a serious restriction on that sort of activity.

Very truly yours,

Donald B. Basko,
State Oil and Gas Supervisor

DBB:wal

141

THE STATE OF WYOMING

Public Defender

1712 CAREY AVENUE
CHEYENNE, WYOMING 82002
(307) 777-7137

ED HERSCHLER
GOVERNOR

LEONARD D. MUNKER
STATE PUBLIC DEFENDER

CHARLOTTE W. RONEY
FISCAL OFFICER

November 16, 1983

Lt. Col. Peter Walsh
AFRCE-BMO/DEV
Norton AFB, California 92409

Dear

In reaction to the WYOMING AND NEBRASKA SOCIOECONOMIC IMPACT STUDY - September 1983 (for which we provided input), relative to the Department of the Air Force's Peacekeeper in Minuteman Silos, please be advised of the following corrections necessary:

1. Page 3-362, fifth paragraph, third sentence should thus be changed: "Not all attorneys work full time for the public defender and not, but all counties have public defender staff who are devoted solely to courts within the county." *

2. Page 3-362, eighth paragraph, should thus be changed "In fiscal year 1982, the Public Defender's office Wyoming Public Defender Program handled 1,152 new cases new cases statewide at a cost of $969,379 or an average of $508 per case. In addition, the office funded outside court-appointed courses in 472 cases at a total cost of $189,655 or $398 per case; program expended a total of $189,655 or $398 per case on outside court-appointed counsel involving 472 cases."

594

3. Page 3-362, tenth paragraph, should thus be changed "The staff for the subdistrict include one full time assistant public defender; one assistant public defender dedicated 50 percent to the subdistrict, and two part time attorneys on personal services contracts; four part time public defenders dedicated fifty percent to public defender work and otherwise engaged in the private practice of law."

4. Page 3-303, first paragraph, should thus be changed: "Support staff include two one full-time legal secretaries secretary."...

594 Please feel free to contact this office, if we can be of further assistance.

Thanking you for your attention to these changes, I am

Very truly,

Charlotte W. Roney

CWR:klw

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Public Service Commission

CAPITOL HILL BUILDING
320 W. 25TH STREET CHEYENNE, WYOMING 82002

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CHIEF ENGINEER
WILLIAM M. ROONEY
DIRECTOR, MOTOR TRANSPORTATION
WILLIAM L. JOHNSON
DIRECTOR, RATE AND TARIFF

MEMORANDUM

TO STATE PLANNING COORDINATOR

FROM: Jon F. Jacquot, Lead Electrical Engineer, PSC

DATE: November 15, 1983

SUBJECT: Draft Environmental Impact Statement (Draft Statement) and supporting Environmental Planning Technical Reports (Technical Reports) for Peacekeeper in Minuteman Silos as related to Wyoming public utilities. State Identifier Number 82-149

The following are this agency's comments regarding deficiencies in the subject documents as they apply to electrical, telephone, and natural gas utilities and their Wyoming customers. Specifically, we address impact on the following utilities: Cheyenne Light, Fuel and Power Company, Rural Electric Company, Wheatland Rural Electric Association, Inc., Wyrulec Company, Mountain Bell, United Telephone Company of the West (United), and KN Energy, Inc. The documents fail to realistically and adequately address utility rate impact caused by additional utility commodity demand and plant investment for direct and indirect project activities. The documents also do not address the ability of utilities to respond to service requests in a timely manner.

Electrical Utilities

Availability of electrical energy and bulk transmission capacity is sufficient for the project and related population growth; however, the project could push local demands to levels where ratchet rate increases from wholesale suppliers to utilities may be triggered. We anticipate the highest electrical demand will
972 occur during the construction phase; but the Air Force has not provided sufficient site specific information to quantify the level of such demand. Erroneous assumptions appear to have been used by the Air Force with regard to electrical demand in writing the Draft Statement. We expect increased costs will be passed on to all electrical utility customers unless the Air Force takes mitigating measures. The Air Force has not committed itself to any mitigating measures and, in fact, states that electrical utility rate impact will be of little consequence.

972 The Air Force has not specifically addressed the possible need for electrical utilities to upgrade and expand their local distribution systems to accommodate increased electrical loads caused by both the project and the related population growth. The cost of such work could end up being paid by all electrical customers unless performed under well designed and enforced extension policies where the party responsible pays for the work. Even well designed and enforced extension policies may not prevent increased rates to consumers because of difficulties in identifying project specific costs and the temporary nature of construction loads, including the transient population involved.

973 The Air Force does not address the possible inability of electrical utilities to respond to requests for service in a timely manner due to a shortage in the immediate availability of trained personnel and materials. Electrical utilities will also have personnel availability taxed due to requests for underground facility locations and repairs of dig-in damage to facilities. Occurrence of dig-ins to underground facilities is always greater in areas of heavy construction and economic growth.

974

975

Telephone Utilities

The Air Force makes conflicting and unfounded statements about telephone utility central switching facilities (central office) and their capacity to absorb growth. We find that central office capacity throughout the region is sufficient to accommodate the project and related population growth. The Technical Reports make some specific statements about the capabilities of various Mountain Bell central offices but no mention is made of United central offices or changes being presently made therein.

With the exception of the insufficient cabling between Warren Air Force Base and the Mountain Bell Cheyenne central office, the Air Force has not addressed the possible inability of telephone outside plant throughout the region to accommodate growth. The Air Force appears to assume that this matter is not critical based upon statements made by telephone utility personnel. Such statements may have been made based on insufficient and misleading information provided by the Air Force. Installation of sufficient outside telephone plant may cause the same rate impacts as described for electrical utilities. Telephone utilities will also experience manpower and material problems as described above for electrical utilities. Mountain Bell has recently undergone drastic reductions in its outside plant construction forces which further aggravates this situation.

985

Natural Gas Utilities

Natural gas supplies in the region are adequate to provide for the needs of the project. The Air Force has apparently made an erroneous estimate of its increased needs at Warren Air Force Base in the Technical Reports. Again, the Air Force has not addressed rate impact and manpower and material problems which the electrical utilities may encounter. Such problems will be similar to those encountered by electrical utilities.

978

Conclusion

These comments are general in nature. Our comments on specific paragraphs and tables of the Technical Reports are attached. We respectfully request the Air Force make appropriate changes in its documents to reflect these comments and cite specific mitigating proposals.

Comments of the Public Service Commission of Wyoming
Regarding Specific Portions of the Environmental
Planning Technical Reports for
Peacekeeper in Minuteman Silos

Utilities

967 Table 1 1-3 states electrical energy requirements for the project but ignores demand requirements on the supplying utilities.

Paragraphs 2.1 and 2.5.5 state that telephone service to Warren Air Force Base and the deployment area is provided by Mountain States Telephone and Telegraph Company (Mountain Bell) and United Telephone Company of the West (United) but ignore service pro- ded in the area by Chugwater Telephone Company

876 Paragraph 2.4.3 states no utility data was obtained from field studies Only field studies can provide an independent and adequate impact picture.

869 Paragraph 2.6.5.1 states that adequate capacity is available in the Mountain Bell Cheyenne central office to handle project impact and states that outside plant capacity to Warren Air Force Base is inadequate. The possible inadequacy of outside plant to service the expected population growth is ignored

877 Paragraph 2.6.5.2.5 states that the Mountain Bell Laramie central office is adequate to accommodate projected growth We expect Laramie will not see significant impact due to the project and thus we see no relevance to its inclusion.

878 Paragraph 2.6.5.2.6 states that the Mountain Bell Pine Bluffs central office currently accommodates 718 subscribers and has capacity for 60 additional subscribers. These numbers are inaccurate according to Mountain Bell management

879 Paragraph 2.6.5.2.9 states that the Mountain Bell Wheatland central office presently accommodates 3,065 subscribers while it is only capable of serving 750 subscribers This information is not technically sufficient and is unclear

880 Paragraph 3.1.5.1 states that rates of growth and needed expansion of telephone facilities cited are based on telephone company estimates We suspect the telephone utilities were not provided with sufficient information by which to make adequate projections, especially for outside plant requirements This could lead to rate impact not currently foreseen by the telephone companies

881 Paragraph 3.2.1.5 states that Mountain Bell and United can make additions to their systems and pass costs on to their customers The Air Force evidently does not care about rate impacts on existing customers or finding ways of mitigating such impact or it would state them in their documents

882 Paragraph 3.2.2 states in general that utility systems can be expended to accommodate growth and the Air Force may pay for direct impact mitigation This does not specify definite impact mitigation or address indirect impact mitigation

870 Paragraph 3.5.5.1.1 states that the Mountain Bell Cheyenne central office capacity will be exceeded in 1984. This does not agree with Paragraph 3.e 1.1 cited above and does not address necessary outside plant growth required to accommodate the project The citation of a current growth rate of 1,100 to 1,200 lines per year likewise seems questionable

883 Paragraph 3.5.5.2.2 states that project related growth in demand for telephone service outside the Cheyenne exchange will not be significant We submit that Pine Bluffs and other communities near the deployment area may experience very significant growth in such demands for service

871 Paragraph 3.6.2, in addressing placement of intersite cables, fails to address dig-in problems with existing underground utility facilities Dig-ins of underground utility facilities during upgrading and construction of transportation facilities is also not addressed.

Energy:

967 Paragraph 1.1 gives a general description of site work to be done but is insufficient to allow assessment of electrical energy and demand requirements to accomplish said work

Table 1.1-3 gives, among other things, electrical energy requirements for the project but makes no mention of electrical peak demand to be placed on utilities.

Paragraph 2.2 - Same as table 1.1-3 above

968 Paragraph 2.6.2.2 indicates no electrical utility system will encounter problems serving project demands. In fact, the distribution facilities of Wyrulec, Inc Wheatland Rural Electric Association, Inc and Rural Electric Company may have to be upgraded to provide adequate construction power to each site This could cause utility rate impacts and the utilities may not be able to respond to such service requests as quickly as the Air Force would like due to trained manpower and material availability

969 Paragraph 3.1.1.1 states the Air Force views impact on electric supply systems conservatively which may not be justified as expressed herein.

970 Paragraph 3.2.1 indicates that the Western Area Power Administration (Western) can provide service for on-base construction, but Paragraph 3.5.1.2.1 indicates it cannot Paragraph 3.5.1.2.1 also indicates the existing Western delivery substation will have to be upgraded from 7.2 KV to 10,000 to 12,000 KV when the existing line from the substation to Warren Air Force Base is a double circuit 13.8 KV line None of the above makes any sense as the information is inaccurate and illogical.

968 Paragraph 3.5.1.2.1 indicates peak demand in the deployment area during construction should pose no problem and that no interference to the Air Force buried cables by electric utility lines will occur due to close coordination with electric utilities Experience during the Minuteman III modification indicates such coordination is generally poor and that site specific demand requirements may be difficult to serve with existing utility facilities

971 Paragraph 3.5.1.2.2 gives expected demand increases for the Cheyenne Light, Fuel and Power Company system but does not realistically state the rate impact due to that increase.

976 Paragraph 3.5.2.2.1 states that additional gas supplies necessary at Warren Air Force Base will be 690 mcf/year It does not explain how so little gas will adequately heat 400,000 square feet of new building floor space at Warren Air Force Base

977

-2-

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STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Public Service Commission

CAPITOL HILL BUILDING
320 W 25TH STREET CHEYENNE WYOMING 82002

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CHIEF ENGINEER
WILLIAM M. ROONEY
DIRECTOR MOTOR TRANSPORTATION
WILLIAM L. JOHNSON
DIRECTOR RATE AND TARIFF

MEMORANDUM

TO STATE PLANNING COORDINATOR

FROM Jon F Jacquot, Lead Electrical Engineer, PSC

DATE October 14, 1983

SUBJECT Peacekeeper Socio-economic Impact Study

955 The impact by the Peacekeeper Missile Project on utilities, their existing customers and potential customers is inadequately covered in the subject study and should be more thoroughly addressed Section 1.3.1.2 and other sections do not, but should, address the following issues as they pertain to the electric, natural gas and telephone utilities, utility service to the project, utility service to existing customers and utility service to new customers moving into the area as a result of the project

1 Availability of utility commodities

2 The ability of utilities to respond to requests for service from and to make the necessary line extensions to the project and other new customers in the affected area

979 3 The cost of utility line extensions to new customer locations and how such extension will be financed

4 The effect of new line extensions and the resulting increase in utility plant investment on utility rate bases and ultimately utility rates

5 The effect of an increase in utility loads on the rates of utilities

6 The effect of increased utility operating expenses on utility rates

7 The effect of increase utility sales on utility rates

979 In fact, the impact which we ask the Air Force to address may very well cause an increased workload for the Public Service Commission, its staff, as well as the affected utilities

We respectfully request that the Air Force consider and address the above impact issues as we have previously requested of Air Force consultants

jfj cap

144

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

1920 THOMAS — CHEYENNE, WYOMING 82002

ALVIN F. EASTRON P.E.
Director
777 7000

October 12, 1983

Governor Ed Herschler
C/O State Planning Coordinator's Office
2320 Capitol Ave.
Cheyenne, WY 82002

RE: MX Impact
Document Review

Dear Governor Herschler:

Thank you for giving the Wyoming Recreation Commission the opportunity to review the Wyoming and Nebraska Socioeconomic Impact Study.

Three of Wyoming's state parks, Guernsey, Glendo and Curt Gowdy are located within the 7-county region area of site influence. Data for these state parks is presented in Chapter 10 (Volume 2) Regional Consideration in Section 10.1.1.3 entitled State of Wyoming. Additional information is also contained in Volume 3, Appendix A entitled Methodologies; Section A.6, Recreational Facilities, Regional Recreation.

1244 The Wyoming Recreation Commission (WRC), at this time, is unable to provide proper review of this study due to the fact the methodology used by the consultants is not adequately documented. There are two areas of concern within the methodology section where the lack of documentation is very pronounced, they include; within Appendix A; A. 6. Recreational Facilities, the methodology used to convert visitation (for state parks visitation is the number of visitors and visitor days) to activity days is only briefly described. The WRC does not believe that an activity day is the best measure of visitation at each park and therefore this type of measurement is not used. The problem, in this study, however is the lack of description or documentation as to how the conversion was made and with what data. Therefore, it is impossible to determine if the conversion was completed properly and if the correct data was used.

The second area of concern within this study relates to the methodology used to determine the growth in activity participation. The consultants state that a computerized gravity model was developed to forecast future rates of

Governor Ed Herschler
October 12, 1983
Page 2

1244 participation (Volume 3, Appendix A, Methodologies, page A-67). within any technical study it is standard, when a model is used to describe the model, to present the mathematical formulas used, to document any variables and/or coefficients, along with any assumptions made. This study does not document this data and therefore the Recreation Commission can not verify or dispute any assumptions made. The lack of documentation in both instances is very disturbing and makes any information provided suspect.

1242 It is important to note that on page 10-44 (Volume 2) the following statements is made, "... Staff-to-Visitation indicates that no additional staffing is required for the baseline level of recreational service to continue during peak year." Table 10.1.1-9 (page 10-18) Operations and Maintenance Staffing at Wyoming State Parks, indicates the WRC has proposed an additional lead worker position for Curt Gowdy State Park. This proposal was made before the Commission received any instructions on preparing the agency budget. In order to observe your wishes of a no growth budget, the Commission will not be requesting an additional position. Consequently, the statement that "no additional staffing is required" is not valid.

1241 The Mitigative Measures as proposed in Chapter 10, page 10-46 (10.1.4) are not adequate and the following additions are needed. The WRC is currently very concerned about the provision of adequate law enforcement at all three state parks. With additional use the problems now experienced by the park visitor will become more pronounced and will need to be addressed. The consultants who prepared this study were made aware of this concern regarding law enforcement but chose to overlook the problem within the Mitigative Measure section. Also a monitoring program is necessary but

1239 should not be construed as a proper mitigation measure if the demand for the parks recreational facilities is greater than the current supply of facilities available.

1240 The Recreation Commission is quite concerned about the potential impacts from this project to the state parks, especially at Curt Gowdy. An entire section of land (Section 2), adjacent to Curt Gowdy was recently purchased by the state in order to expand the park. Expansion on this area is being held up, not because the demand for additional facilities is missing, but due to lack of funding. If properly developed, this section of land would adequately meet the additional demand created as a result of basing the Peacekeeper in Wyoming.

If adequate documentation is provided, members of my staff will review this document again.

Sincerely,

Alvin F. Eastron, P.E.
Director

AFE/JB/ir
cc: E. Lawson Schwoge, Commissioner, Cheyenne
Larry Birleffi, Commissioner, Member at Large

145

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

1920 THOMAS — CHEYENNE, WYOMING 82002

ALVIN F. EASTRON P.E.
Director
777 7000

November 14, 1983

Mr. Dick Hartman
State Planning Coordinator
2320 Capitol Ave.
Cheyenne, Wyoming 82002

RE: 82:149

Dear Mr. Hartman:

Thank you for giving the Wyoming Recreation Commission (WRC) the opportunity to review both the Draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos and the Draft Environmental Planning Technical Report, Land Use.

The WRC was assisted in this review by the staff of the University of Wyoming's Recreation and Parks Administration Department. A copy of their comments is attached and the WRC would request that these comments be included in the State's official reply. The WRC asked for the University's assistance due to the fact the WRC staff has limited experience with computerized gravity models. The consultants, who prepared the D.E.I.S., did use a gravity model as a major component of its estimation of demand.

Throughout this ever changing project the WRC has remained constant regarding its concerns about basing the Peacekeeper in Wyoming. A brief summation of these concerns include:

1. Potential for long term camping by members of the construction work forces at Curt Gowdy State Park.
2. Potential law enforcement problems.
3. Potential impacts caused by the demand for facilities being greater than the supply of facilities available.

Because of the change of basing the Peacekeeper from "Densepack" based west of Cheyenne to existing minuteman silos, the WRC's concern regarding the potential for workers living in Curt Gowdy has been lessened. After reviewing both reports very carefully the WRC has concluded that the other concerns listed, # 2 & 3 above, are legitimate and were not considered adequately in either documents.

Page 2

1. 1176 Currently all state parks in Wyoming are experiencing problems regarding law enforcement. These problems are numerous and increase in magnitude as park visitation increases. The WRC estimates that at least 70% of the visitation to Curt Gowdy is by Cheyenne and Laramie County residents. With the basing of the Peacekeeper in southeast Wyoming the population in the area will increase and consequently the visitation to Curt Gowdy will also expand. Therefore, the potential for user conflicts, vandalism and park disturbances will grow and could lead to a life threatening situation for a park visitor or WRC personnel. The WRC is already experiencing law enforcement problems prior to the advent of the Peacekeeper and is concerned that a sudden growth in visitation without adequate personnel or park development will only compound the problem. This is especially true because the WRC currently relies on the Laramie County Sheriff's Department for assistance. This arrangement could change in the future based upon the severity of impact and staffing for the Sheriff's Department.

   The consultants who completed the D.E.I.S. were notified numerous times of this concern but chose not to include it in their analysis in either the regional recreation or law enforcement considerations. This problem was also overlooked in the proposed mitigation measures for regional recreation as listed on page 3-58, Section 3.7.2.1 of the Draft Environmental Planning Technical Report, Land Use.

2. On pages 3-54 and 3-57 of the Technical Report, the following statement is made; "Impacts at the regional level are moderate because there are already facilities that virtually reach peak capacity on certain seasonal and holiday weekends and any additional use exacerbates an existing overcrowded situation, thereby contributing to a noticeable decline in the perceived quality of the recreational experience. Moderate impacts are significant because additional recreation demand contributes to competition for space among conflicting activities or overuse for the same activity, thus creating a potential hazard to public safety."

   On page 3-18 the following definition is presented (3.4.2.1. Regional Recreation); "For regional recreation, an impact is significant if public health or safety is affected. Safety is related to the potential for injury to oneself or others in overcrowded situations which may create unsafe conditions. These conditions occur when space is limited for an activity and there is too much demand for that space, or when the same space is used for conflicting activities."

   The following statements listed on page 3-58, Section 3.7 of the Technical Report were offered by the consultant as potential mitigation measures:

Page 3

3.7.2. Recreation

3.7.2.1 Regional Recreation

- o Implement an environmental awareness program to educate the population about problems associated with poaching, illegal fishing, vandalism, violations of park regulations, ORV abuse, etc. (USAF contractor).
- o Work with the Wyoming Recreation Commission to develop techniques to protect against long-term camping at nearby recreational areas (USAF contractor).
- o Implement a monitoring program to continue throughout the project deployment period to assess changes in conditions at major recreational areas in the region (state and federal agencies).
- o Development management techniques to control the numbers of people entering already overcrowded facilities (state and federal agencies).

1210 These mitigation measures do not address the level of impact as described and are indadequate. These measures especially do not address the area of public safety which has been the area of greatest concern for the WRC. The last measure, i.e. management techniques, is rather nebulous and is currently impossible to carry out. Any techniques developed would require either additional manpower or park facilities to control the number of people entering the park. Currently the WRC doesn't have the resources to address this proposed mitigation measure.

3. 1200 Based upon past experience the Employment Security Commission currently estimates that there are 10 applications for each job opening and feels this could occur with the Peacekeeper. Also, part of the workforce needed will be hired before moving to Cheyenne. Regardless of employment, these individuals are faced with an initial decision when arriving as to where to stay. If employed, the worker may have to wait until housing becomes available. If unemployed, the job seeker may need temporary shelter of some kind. Therefore, both individuals may be faced with a decision of either staying in a motel/hotel, staying at a KOA type campground or finding a camping space for their RV, pickup, stationwagon, tent, etc. Because Curt Gowdy State Park is the nearest public campground to Cheyenne, the WRC is concerned that many of these individuals will be staying at the park. After reviewing Appendix B, Technical Report, Detailed Methodology for Regional Recreation Analysis the WRC cannot find any mention of this type of use. Consequently, until this type of use is considered, the WRC considers the recreation analysis as incomplete and therefore inadequate.

Page 4

As mentioned previously, the consultants who prepared the regional recreation considerations used a gravity model to estimate the increase of activity days for various activities at the state parks in the Region of Influence (ROI). This model was adequately reviewed by the University and therefore was not mentioned in these comments.

The WRC would recommend that the consultants address all of the concerns and issues identified and consequently would suggest possible revisions in the proposed mitigation measures.

If you have any questions or need information, please feel free to contact me.

Sincerely,

Alvin F. Bastron

Alvin F. Bastron, P.E.
Director

AFB/JB/lr

cc: All Commission Members

November 11, 1983

TO: Shelby Gerking, Director I.P.R.

FROM: Tom Buchanan and Lawrence R. Allen
Department of Recreation & Park Administration

RE: Draft EIS For the Peacekeeper Missile

1. Sect. 1.1, Page 1-3, Table 1.1-1, Table 1.2-1 - Anticipated impacts are based upon manpower requirements associated with the project. No mention is made of the large number of transient (and frequently unemployed) workers who follow these types of projects in an attempt to find employment. Based upon past history at other impacted areas in Wyoming, it is reasonable to assume that population impacts will exceed population growth associated with manpower requirements.

2. Sect. 1.1, Page 1-10, Table 1.1-3 - Material resources needed for construction include 516 acre feet of water. No mention is made of where this water will come from. If the water is to be diverted from one of the state parks in the ACS, it could impact the quality of recreation services. This issue is never addressed.

3. Sect. 2.4.2.1, Page 2-12 - We seriously question the accuracy of using data provided in the 1980 Wyoming SCORP. Most of these data were collected at least two to three years before the SCORP publication date. Also, Dr. Buchanan as a member of the SCORP Advisory Board, recalls considerable criticism being raised regarding the technical accuracy of much of the SCORP data. The fact that existing data sources are less than comprehensive and/or accurate does not negate the responsibility of the lead agency to provide accurate data. Additionally, we would like to see documentation of the verbal estimates of recreation planners associated with state agencies. Without this documentation the lead agency has the license to modify data and attribute that modification to some unknown planner.

COPY

Shelby Gerking
Page 2
November 11, 1983

4. Sect. 2.4.2.2, Page 2-13 - N.R.P.A. open space guidelines were generally developed to provide standards for relatively large metropolitan areas. During their formulation, virtually no consideration was given to their application in rural areas with high percentages of federal lands. At the very least, their use must be cautious with a considerable number of regional qualifications. The general application of standards to the community level recreation needs must also be heavily qualified because this approach fails to consider: (1) social priorities (2) population densities.

5. Sect. 2.6.2.1.1, Page 2-39 - What is meant by the term "educational transportation"?

6. Table 2.6.2.2, Page 2-45 - Downhill skiing visitor days appear to be underestimated. Ski area operators, rather than U.S.F.S. R.I.M. reports should be used to accurately assess use.

7. Sect. 2.6.2.1.2, Page 2-46 - Visiting Medicine Bow National Forest on one July weekend and counting license plates to determine residence of visitors is neither valid or accurate. There is no way this sample can be accepted as representative of visitors to this site.

8. Sect. 2.6.2.1.2, Page 2-46 - The assumption that as use on the Medicine Bow increases, visitors will redistribute themselves to lesser used sites is not valid. This conclusion is based on the assumption that all sites are of equal attractiveness. In fact, sites currently showing high visitation to capacity values will probably exhibit the greatest increase in use since these are the most attractive and hence most heavily used sites.

9. Sect. 2.6.2.1.5.1, Page 2-50; Sect. 3.5.2.1, Page 3-28 - Although your statements about numbers of participants at each state park within the ROI are correct, your assumptions about the similarity of recreation use across parks is erroneous. Curt Gowdy State Park is approximately 1645 acres, 285 of which are the surface area of Crystal and Granite Reservoirs. Glendo State Park by comparison is more than ten times this size. There are also major differences in numbers of facilities. When comparing impacts across sites, you are comparing apples to oranges. An increase in 20 visitor days of powerboating at Curt Gowdy State Park may have a considerably greater impact than an increase of 200 visitor days of powerboating at Glendo State Park. The impact of increased use must be discussed in the context of park capacities.

10. Sect. 2.6.2.1.5.1, Page 2-52 - A one-time field investigation of park use following a major holiday is not a valid technique for estimating park use.

11. Sect. 2.6.2.1.5.1, Page 2-52 - It is well documented in the research literature that conflict is not an "over-capacity condition." Rather, conflict is goal interference caused by the behavior of another user and can occur irrespective of the number of park visitors.

12. Sect. 2.6.2.1.8, Page 2-61 - "Gray Reefs" should be "Gray Rocks."

13. Sect. 2.6.2.1.8, Page 2-62 - Estimates of recreation use at North Crow Reservoir are based upon a sample size of 1.

14. Sect. 2.6.2.2.1.2, Page 2-64 - The inclusion of 75 acres of developed ballfields when estimating parkland deficiencies is not correct. These facilities are in some instances not available to the public and in general are used by a very narrow age range. The inclusion of this acreage is arbitrary and influences the conclusion that Cheyenne has excess parkland.

15. Sect. 2.6.3.2.1, Page 2-84 - We believe Figure No. 2.6.3-10 and Figure No. 2.6.3-12 should be reversed.

16. Sect. 3.1.2.1.1, Page 3-8 - Suggesting that because visitation fluctuates from year to year, use projections are not necessary is incorrect. We suspect that trying to contend with visitation data from so many agencies became unwieldly, and the authors decided to rationalize their inability to integrate incompatible data.

17. Sect. 3.2.1.2.1, Page 3-12 - Assumption number 2 regarding visitor use levels cannot be supported. Assumption number 3 regarding participation patterns is not valid. In fact, the authors contradict themselves on page 3-8 when they state "visitation trends tend to exhibit broad swings from year to year depending upon. . . social and demographic characteristics." Assumption number 3 is only viable if we are willing to assume that the population influx will exhibit approximately the same sociodemographic characteristics as current residents of Cheyenne. Past experience within Wyoming has shown this not to be the case. Of particular importance to recreation behavior will be shifts in age, income and household social structure. We believe this assumption is untenable yet it provides the basis upon which all recreation impact estimates are made.

18. Sect. 3.5.2.1.1, Page 3-18 - By including areas outside the ACS in your gravity model, you are reducing the relative attractiveness of sites within the ACS, and therefore your model will consistently produce impact assessments lower than if you only included areas within the ACS. At the very least, estimates for both scenarios should be provided.

19. Impact assessment is limited entirely to estimates of activity days produced. Law enforcement issues, squatters on state and federal lands and other management problems associated with increasing use and transient populations are never identified or discussed. This is an extremely narrow conceptualization of what constitutes "impact."

20. Since the U.S.F.S. and the W.R.C. are the two regional recreation agencies most affected by this project and because both of these agencies use visitor days to estimate use, it would be more appropriate to assess impacts in visitor days than in activity days.

21. What is the basis for assuming that no increase in staffing will be needed to accommodate increasing use at recreation areas? Most regional recreation areas are already understaffed. Curt Gowdy State Park, for instance, only has [redacted] full-time staff positions to maintain a park with more than 67,000 visitors. Conclusions regarding staffing are not supported by the data and appear to have no basis in fact.

22. Re: Gravity Model - We do not believe there is an attractiveness measure for all sites, nor is the number of alternative sites included in the gravity model. The authors cite a relatively obscure publication when documenting their model, and hence it is not really possible to verify what they have done. Also, there is no existing data which would allow for the determination of participation days at each recreation area in the model (e.g. number of Cheyenne residents visiting Medicine Bow National Forest). The quality of the reported impacts are in all likelihood inaccurate for all areas investigated. Further, if the data being used for the analysis are from the SCORP, then the authors have committed an aggregation bias by attempting to take data representative of state participation and infer characteristics to only one city in the state. This can't be done.

23. Sect. 2.1.2.2.2, Page 2-9 - There is no justification given for not including Laramie, Scottsbluff, Torrington and Wheatland within the area of concentrated study for local recreation impact. Therefore, the entire report neglects the potential impact on local recreation services within these communities.

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

1920 THOMAS — CHEYENNE, WYOMING 82002

ALVIN F. BASTRON, P.E.
Director
777-7695

November 16, 1983

Dick Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Dear Mr. Hartmann:

The DEIS-Peacekeeper in Minuteman Silos--was received in this office. Thank you for giving us the opportunity to comment.

Enclosed is a memorandum from our staff archeologist and historian who reviewed the materials. They indicate that further work must be done before the the Wyoming State Historic Preservation Officer (SHPO) can recommend to the U.S. Air Force that they grant cultural clearance for the project in accordance with state and federal laws.

If you have any questions concerning this recommendation please contact the appropriate member of our staff.

Sincerely,

Mark Junge
Deputy SHPO

FOR:
Alvin F. Bastron, Director and
State Historic Preservation Officer

MGJ:kim
Encls.

WYOMING RECREATION COMMISSION

STATE HISTORIC PRESERVATION OFFICE

REVIEW AND COMPLIANCE

Interdisciplinary Staff Comments

Archeology • History • Historical Architecture • Recreation Planning

TO: Mark Junge, Chief

FROM: Richard Bryant, Compliance Archeologist
Dennis Madden, Compliance Historian

DATE: November 16, 1983

RE: §Peacekeeper in Minuteman Silos--DEIS

We concur that the overview's treatment of prehistoric, American Indian and historic resources is adequate for this stage of the project. However, before SHPO can recommend that clearance be granted, the Air Force must submit the findings of current investigations undertaken to identify all extant archeological and historical resources within the ROI. The report should include evaluations of these properties and a complete discussion of how they will be impacted by the proposed Peacekeeper facilities.

1273

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THE STATE OF WYOMING — ED HERSCHLER, GOVERNOR

State Engineer's Office

BARRETT BUILDING — CHEYENNE, WYOMING 82002

November 18, 1983

MEMORANDUM

TO: Paul Cleary, Natural Resource Analyst, State Planning Coordinator's Office

FROM: George L. Christopulos, State Engineer

SUBJECT: Technical Review of the Draft Peacekeeper Water-Supply Development Plan - Wyoming Deployment Area and the Draft Environmental Impact Statement.

1303 Personnel of the State Engineer's Office have been in direct contact with Air Force representatives and representatives of the Consultant Group consisting of Ertec Western, Inc. and URS-Berger since November, 1982, concerning the Peacekeeper Water Supply Analysis. Numerous office visits by these consultants, telephone conversations, and reviews of various water supply scenerios have been conducted by this office.

1303 The "Draft EIS" and the "Draft Peacekeeper Water-Supply Development Plan Wyoming Deployment Area" adequately address the water resource in the Wyoming Deployment area, and the water demands needed for construction at Warren Air Force Base, field modification of the launch control facilities and affected silos, and the water demand for personnel and dependents associated with the project.

1303 The total quantity of water required for the Peacekeeper In Minuteman Silos (PIMS) project is estimated to be 3,645 acre-feet over the six-year period (1984-1989). The longterm demand for domestic use in Cheyenne and at FEW AFB after construction is complete and the system has been installed is estimated to be 209 acre-feet/yr. The total volume of water, 3,645 acre-feet, will be used as follows:

Paul Cleary
November 18, 1983
Page 2

Use	Total A.F.	Peak Demands
Domestic in Cheyenne and vicinity	2,962	789
Domestic at FEW AFB	95	19
Construction at FEW AFB	67	49
Domestic use in Deployment Area	221	105
Construction use in Deployment Area	300	160
Total	3,645 A.F.	

City of Cheyenne

1303 The peak demand in the Cheyenne community of 808 acre-feet will occur in 1987. This demand will have to be met by the City of Cheyenne municipal water system. This quantity of water will amount to about a 6% increase over the projected municipal demand without the PIMS related impact. Contacts with the Cheyenne Water Department have indicated the Stage II System construction, if completed on schedule, should be adequate to supply this minor increased demand. Should adverse weather, unforeseen construction problems or unusually low spring runoff in the Crow Creek drainage occur in the Spring of 1984, water restrictions in the City of Cheyenne service area may need to be considered. This would be contingent upon the yield of the Cheyenne municipal well fields.

Domestic Water needs in Deployment Area

The domestic water needs in the Deployment Area should be adequately met by the existing capacities of the municipalities involved. The following table summarizes the 1980 use, sustained capacity, and additional demand resulting from the PIMS activity for the various communities:

Community	1980 Use (acre-feet/yr)	Sustained Capacity (acre-feet/yr)	Maximum PIMS Demand (acre-feet/yr)	% of 1980 Use
Laramie	6,000	11,700	33	0.5
Pine Bluffs	513	3,145	7	1.4
Torrington	4,820	8,450	47	0.9
Wheatland	2,480	3,800	26	1.0

Paul Cleary
November 18, 1983
Page 3

Construction Water Needs in Deployment Area

1303 The total volume of water required for construction purposes in the Deployment Area is 300 acre-feet. A peak year demand of 160 acre-feet will occur in 1985. During 1980, 143,000 acre-feet of ground water and 193,000 acre-feet of surface water was utilized in Laramie, Platte, and Goshen Counties. The 160 acre-feet/yr required for temporary construction purposes should be easily obtained through Temporary Use Agreements with holders of existing valid water rights or new permits to appropriate water.

Conclusion

1303 The 3,645 acre-feet of water needed for deployment of the PIMS System should not create any major demands upon the water resources of the area. The existing water delivery capabilities of all the municipal systems involved will be adequate with the possible exception of the Cheyenne Municipal System if construction delays occur with Stage II. Water for temporary construction purposes is available through Temporary Use Agreement procedures or temporary appropriation procedures.

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THE STATE OF WYOMING

Wyoming State Highway Department

P. O. BOX 1708 — CHEYENNE, WYOMING 82002-9019

October 12, 1983

MX Impact Document Review

Mr. Dick Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Mr. Hartman:

We have reviewed the Wyoming and Nebraska Socioeconomic Impact Study and have the following comments on transportation related impacts:

Volume 1, Chapter 3, Section 3.2.10.1.2, Page 3-141

1056 The traffic corridors and intersections identified for further study are among the most critical and impact sensitive in the community. No indication is given in the report regarding when these studies would be conducted. Considering that the Fiscal Impact Analysis is scheduled to be completed by February 1, 1984, and facility construction is slated to begin in the spring, 1984, further study is pointless. Decisions must be made now. We suggest that the Cheyenne Area Transportation Planning Process be solicited to identify problems and develop and implement solutions.

Volume 1, Chapter 3, Section 3.2.10.1.4, Page 3-146

1039 This is merely a shopping list of mitigation measures that might be utilized, but there is no commitment to implement any of them. The "Capital Intensive" projects are needed now and the Peacekeeper project makes the need much more urgent. State and local governments prioritize these needs within their resources and simply cannot react within the Air Force time frame.

Volume 1, Chapter 3, Section 3.10.6
Volume 1, Chapter 4, Section 4.9.6
Volume 1, Chapter 5, Section 4.9.6

These sections address Transporter/Erector routes in Laramie, Platte, and Goshen Counties. The State Highway Department is participating with the Military Traffic Management Command, the Federal Highway Administration, the Air Force and the counties in the study to evaluate the condition and deficiencies of these routes. We hope that this study will lead to agreement on needs and a positive program of improvement.

1040

General

The baseline data has been supplied by state and local governments and is well presented and analyzed. The report, however, is overly cautious in stating impacts and quite noncommittal in stating mitigating measures to be implemented. Heavy reliance is placed on lists of possible impacts and potential mitigation measures.

1038

The major impact is to budgets. Most of the needs identified have been recognized through systematic transportation planning and a program within available resources formulated for their improvement. The time frame for the MX makes all of these needs immediate and beyond the ability of local resources to respond. Financial assistance will have to be provided.

1039

For modifications to state highways, work must be started within the next 90 days in order to make needed surveys, prepare contract plans, secure approvals and other related activities if the stated time frame is to be met. Preparatory work cannot begin until agreement is reached on payment for the modifications.

Very truly yours,

William P. King, P. E.
Environmental Services Engineer

WPK/RLK/mg

THE STATE OF WYOMING

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Wyoming State Highway Department

P. O. BOX 1708 CHEYENNE, WYOMING 82002-9019

October 24, 1983

Draft EIS
Peacekeeper in Minuteman Silos
State ID 82-149

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Mr. Hartman:

We have reviewed the subject Draft EIS and have nothing to add to our comments submitted October 12, 1983, concerning the Wyoming and Nebraska Socioeconomic Impact Study which has been incorporated into this Draft EIS. A copy of our comments is attached. Only pages are changed.

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We cannot overemphasize that design work must be started in January if modifications are to be made to State Highways within the Air Force time frame. Contract documents cannot be produced overnight and the Highway Department will not begin any design work until agreement has been reached on the scope of modification and funding arrangements.

Very truly yours,

William P. King, P. E.
Environmental Services Engineer

WPK/mg

Attachment

THE STATE OF WYOMING

Wyoming State Highway Department

P. O. BOX 1708 CHEYENNE, WYOMING 82002-9019

October 12, 1983

MX Impact Document Review

COPY

Mr. Dick Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Mr. Hartman:

We have reviewed the Wyoming and Nebraska Socioeconomic Impact Study and have the following comments on transportation related impacts:

Volume 1, Chapter 3, Section 3.2.10.1.2, Page 3-14.1

The traffic corridors and intersections identified for further study are among the most critical and impact sensitive in the community. No indication is given in the report regarding when these studies would be conducted. Considering that the Fiscal Impact Analysis is scheduled to be completed by February 1, 1984, and facility construction is slated to begin in the spring, 1984, further study is pointless. Decisions must be made now. We suggest that the Cheyenne Area Transportation Planning Process be solicited to identify problems and develop and implement solutions.

Volume 1, Chapter 3, Section 3.2.10.1.4, Page 3-14a

This is merely a shopping list of mitigation measures that might be utilized, but there is no commitment to implement any of them. The "Capitol Interview" projects are needed now and the Peacekeeper project makes the need much more urgent. State and local governments prioritize these needs within their resources and simply cannot react within the Air Force time frame.

Volume 1, Chapter 3, Section 3.10.6
Volume 1, Chapter 4, Section 4.9.6
Volume 1, Chapter 5, Section 4.9.6

These sections address Transporter/Erector routes in Laramie, Platte, and Goshen Counties. The State Highway Department is participating with the Military Traffic Management Command, the Federal Highway Administration, the Air Force and the counties in the study to evaluate the condition and deficiencies of these routes. We hope that this study will lead to agreement on needs and a positive program of improvement.

General

The baseline data has been supplied by state and local governments and is well presented and analyzed. The report, however, is overly cautious in stating impacts and quite noncommittal in stating mitigating measures to be implemented. Heavy reliance is placed on lists of possible impacts and potential mitigation measures.

The major impact is to budgets. Most of the needs identified have been recognized through systematic transportation planning and a program within available resources formulated for their improvement. The time frame for the MX makes all of these needs immediate and beyond the ability of local resources to respond. Financial assistance will have to be provided.

For modifications to state highways, work must be started within the next 90 days in order to make needed surveys, prepare contract plans, secure approvals and other related activities if the stated time frame is to be met. Preparatory work cannot begin until agreement is reached on payment for the modifications.

Very truly yours,

William P. King, P. E.
Environmental Services Engineer

WPK/RLK/mg

COUNTY AND CITY/MUNICIPAL OFFICIALS AND AGENCIES

BANNER COUNTY COMMISSIONERS
Harrisburg, Nebraska 69345

SUBJECT: Comments on Draft Economic Impact Study and Wyoming-Nebraska Socioeconomic Impact Study. ie: Transporation.

Upon the primary review of the study, especially Chapter 9, as this chapter pertains to Banner County, Nebraska, the Board of Commissioners are in general agreement with the findings of the study in most divisions, except 9.4.4 Transportation--Road Network.

1025 Although traffic counts and estimates were made for ordinary travel within Banner County, in an effort to determine the impact the construction of the Missle complex would have, it is our belief that the results stated in the study will convey a distorted review, since Banner County is a sparsely settled rural County, it does not have the advantage of averaging a change of traffic pattern into a heavy traffic pattern, but any increase in traffic pattern or requirements results in a definite need for change in road maintaince. The movement of agricultural products to market or storage has a very definite impact on county road usage and must be counted in a traffic determination and will not be revealed in an average count.

1026 Paragraph 3 of 9.4.4.3, states "Based on available information, project-operational requirements are no greater than those for existing Minutemen facilities." This statement may be true, but it does not give consideration to the fact that many times the present road system was inadequate for the Minuteman installations. We believe that a better study will reveal that there were many times that due to poor weather all missle sites in Banner County would have been inaccessible by the present road system. As an example in more than one instance when a missle had to be moved during times of very poor road condition because of rain soaked roads, that the Nebraska Department of Roads was ordered to blade all of the wet surface off the road and into the barrow ditch to try to have a dry surface, resulting in as much as 6 inches of roadway being removed which had to be replaced. We believe that an all weather surface is a must to provide adequate movement of Missle traffic at all times, even though operational requirements may not be any greater than the present requirements.

Comments
Page "2"

1027 Paragraph 4, of 9.4.4.3, states that the project requires existing transporter/emplacer routes must be able to accomodate the state transporter vehicle. Due to the great problems encountered on high quality gravel roads in this area, with just ordinary traffic in times of rain or snow soaked roads, the gravel routes even if it were possible to upgrade them will not provide the above requirement. We believe that it is impossible to find the necessary aggregate of the quality needed to provide the 6 inch to 8 inch aggregate base suggested for upgrading the gravel roads, anywhere in Western Nebraska and crushed rock would have to be hauled from adjoining State of Wyoming, at a tremendous expenditure of construction funds.

1028 Paragraph 5, of 9.4.4.3, discusses road standards for road surface type and width. As officials of Banner County with considerable experience in the requirements of road surfaces in all types of weather in this area we cannot agree to any road construction which will not meet or exceed the requirements of the Nebraska Board of Classifications and Standards. Although this area is indeed sparsely populated, the need to travel is more demanding and the distances greater, and with the additional defense requirements it is our desire to insist on safe standards which will accomodate all traffic needs.

Environmental Planning Technical Report:

1022 Paragraph 4 of 3.5.1.2.1.5, discusses projected traffic volume and road capacity. We take issue with the projected count and the statement that the volumes will be considerable lower than even the estimates. We believe from our experience that with the increasing movement of ordinary every day traffic it is fair to expect that volume will not be less than the baseline volumes.

1023 Paragraph 6 of 3.4.1.2.1.5, states "Under No Action, it was assumed that Minutemen T/E routes would continue to be used during baseline years and their physical conditions would remain essentially unchanged." We believe that although the Minuteman routes will be used, they will have to withstand the traffic of the baseline years and stand every possibility to considerable deteriation without an expanded maintainace program. As heretofore stated in these comments it is our belief from years of experience in this area that while the gravel roads as they now exist in Banner County, are of the highest quality you could expect, they are not nearly adequate to provide access to the Minuteman Complex, or later to the MX Complex, at all times there may be a need.

1339 3.5.1.2.4.5 Construction Water Requirements in Deployment Area.

Water use will not adversely affect Banner County provided that all the water is not pumped from one well.

Comments
Page "3"

Therefore we summarize our comments as follows:

1. The criteria for traffic count is not sufficient to reflect peak traffic during harvest seasons, which would also affect defense traffic, even after completion of installations.

2. Emergency movement of defense equipment cannot wait on the weather and past experience has proven that dependance on gravel surfaced roads even if upgraded, will leave sites inaccessible, and will fall far short of the required accessibility of at least 92% of the time.

3. Banner County desires to cooperate in all matters, but it is not in the best interest or safety of the public to accept or agree to any construction standards which do not meet or exceed the present requirements of the Nebraska Board of Classifications and Standards.

4. We recommend that for a project of this magnitude and one of absolute necessity for the defense of our Nation in time of need, construction of first quality all weather concrete or asphalt access routes would be the most justifiable expenditure of public funds and provide the needed all weather access to all Missle sites in time of dire need.

It is not the intent of this Board of Commissioners, or the people of this area to offer these comments, just in hope of upgrading the road system, but we firmly believe that an undertaking of this magnitude deserves the full compliment of access roads of a quality which will assure the full capability of the entire Complex if and when it may be needed.

Respectfully submitted,
Board of Commissioners
Banner County, Nebraska

By: Klayton Johnson
Chairman

151

TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-430

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BANNER COUNTY COMMISSIONERS
Harrisburg, Nebraska 69345

October 7, 1983

Gayle Malmquist
Policy Research Office
P.O. Box 94601
Lincoln, Nebraska 68509

Re: MX Related Review Document

Dear Ms Malmquist:

Enclosed you will find a letter from the Board of Commissioners for Banner County, which I believe will confirm all subjects of our telephone conversation this past week.

Also enclosed is a copy of the letter which you asked be returned with the above letter as comments.

Thank you for your kind interest.

Yours truly,

Eldon Lundberg
Eldon Lundberg

BANNER COUNTY COMMISSIONERS
Harrisburg, Nebraska 69345

October 6, 1983

Martha Beeman
Policy Research Analyst
PO Box 94601
Lincoln, Nebraska 68509

Dear Ms Beeman:

This letter will acknowledge receipt of the Wyoming-Nebraska Socioeconomic Impact Study.

Upon the primary review of the study, especially Chapter 9, as this chapter pertains to Banner County, Nebraska, the Board of Commissioners are in general agreement with the findings of the study in most divisions, except 9.4.4 Transportation---Road Network.

1025 Although traffic counts and estimates were made for ordinary travel within Banner County, in an effort to determine the impact the construction of the Missile complex would have, it is our belief that the results stated in the study will convey a distorted review, since Banner County is a sparsely settled rural county, it does not have the advantage of averaging a change of traffic pattern into a heavy traffic pattern, but any increase in traffic pattern or requirements results in a definite need for change in road maintainence. The movement of agricultural products to market or storage has a very definite impact on county road usage and must be counted in a traffic determination and will not be revealed in an average count.

1026 Paragraph 3 of 9.4.4.3, states "Based on available information, project-operational requirements are no greater than those for existing Minuteman facilities." This statement may be true, but it does not give consideration to the fact that many times the present road system was inadequate for the Minuteman installations. We believe that a better study will reveal that there were many times that due to poor weather all missle sites in Banner County would have been inaccessible by the present road system. As an example in more than one instance when a missle had to be moved during times of very poor road condition because of rain soaked roads, that the Nebraska Department of Roads was ordered to blade all of the wet surface off the road and into the barrow ditch to try to have a dry surface, resulting in as much as 6 inches of roadway being removed which had to be replaced. We believe that an all weather surface is a must to provide adequate movement of Missle traffic at all times, even though operational requirements may not be any greater than the present requirements.

Martha Beeman
Page "2"

1027 Paragraph 4, of 9.4.4.3, states that the project requires existing transporter/emplacer routes must be able to accommodate the stage transporter vehicle. Due to the great problems encountered on high quality gravel roads in this area, with just ordinary traffic in times of rain or snow soaked roads, the gravel routes even if it were possible to upgrade them will not provide the above requirement.
We believe that it is impossible to find the necessary aggregate of the quality needed to provide the 6 inch to 8 inch aggregate base suggested for upgrading the gravel roads, anywhere in Western Nebraska and crushed rock would have to be hauled from adjoining State of Wyoming, at a tremendous expenditure of construction funds.

1028 Paragraph 5, of 9.4.4.3, discusses road standards for road surface type and width. As officials of Banner County with considerable experience in the requirements of road surfaces in all types of weather in this area we cannot agree to any road construction which will not meet or exceed the requirements of the Nebraska Board of Classifications and Standards. Although this area is indeed sparsely populated, the need to travel is more demanding and the distances greater, and with the additional defense requirements it is our desire to insist on safe standards which will accommodate all traffic needs.

Therefore we summarize our comments as follows:

1. The criteria for traffic count is not sufficient to reflect peak traffic during harvest seasons, which would also affect defense traffic, even after completion of installations.
2. Emergency movement of defense equipment cannot wait on the weather and past experience has proven that dependence on gravel surfaced roads even if upgraded, will leave sites inaccessible, and will fall far short of the required accessibility of at least 92% of the time.
3. Banner County desires to cooperate in all matters, but it is not in the best interest or safety of the public to accept or agree to any construction standards which do not meet or exceed the present requirements of the Nebraska Board of Classifications and Standards.
4. We recommend that for a project of this magnitude and one of absolute necessity for the defense of our Nation in time of need, construction of first quality all weather concrete or asphalt access routes would be the most justifiable expenditure of public funds and provide the needed all weather access to all Missle sites in time of dire need.

Respectfully submitted,
Board of Commissioners
Banner County, Nebraska
By

Eldon Lundberg

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

153

RECEIVED
SEP 27 1983
POLICY RESEARCH

MEMO

TO: Lyle Shaw

FROM: Gayle Malmquist

DATE: September 19, 1983

RE: Transmittal of MX Related Review Document

Attached is your copy of the Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) done in connection with the MX missile siting project in Banner and Kimball Counties in Nebraska.

Please review those portions of the document within your agency's jurisdiction, expertise, or authority. Written comments on specific items within the study should be returned to me at the Policy Research Office by September 30, 1983.

Further documents will be forwarded to your office for review in connection with this project. We anticipate receipt of the Draft Environmental Impact Statement on October 7, 1983. If you wish to identify an individual on your staff who will be responsible for coordinating your review, future mailings will be directed to that person.

When your review is complete, detach and return the form below, acknowledging your option to comment and indicating your primary contact person.

If you have questions, please feel free to contact me.

Please return by September 30, 1983

1 We have reviewed the Wyoming-Nebraska Socioeconomic Impact Study.

☐ No comment.

☒ Comments are attached. The socioeconomic impacts and profile and the photographs of the City and County give a good resume of our County. Very well do

Contact person Lyle Shaw Title Chairman, Kimball Co. Commissione

Office Board of County Commissioners, Kimball County, Nebraska

Address 114 E. 3rd Street, Kimball, NE 69145 Date September 22, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

Kimball County Commissioners

114 East Third Street
Kimball, Nebraska 69145
(308) 235-4690

Lyle Shaw
Vernon J. Bourlier
ValDeane Snyder

154

October 12, 1983

Ronald A. Torgerson, Major, USAF
AFRCE-BMS-DEV
Norton Air Force Base, California 92409

Dear Major Torgerson:

The Board of Kimball County Commissioners have reviewed the Wyoming and Nebraska Socioeconomic Impact Study via the State of Nebraska Policy Research Office.

1247 Volume 2 under Special Use Facilities stated the County Fairgrounds is commonly scheduled for rodeo activities. This facility is used mainly for 4-H and FFA competition, not rodeo activities.

831 We feel after reading Volume 3 the report on the Elementary Schools were very biased. Some of the comments were unfavorable. It would be very difficult to connect the report with the condition of the two schools. The comments of the Mary Lynch school, not Mary Lunch as was printed in the study; who was a prominent resident of Kimball County, and the school was named for and the Kimball Junior High and Kimball Elementary Schools comments were unfavorable.

People who have moved to the Kimball Area praise our schools. We feel Kimball County has better schools than we were given credit for. Who inspected this area?

813 There were unfavorable comments on some of the public buildings in Kimball. The Fire Station and Police Department pictures do not do justice to the appearance of these facilities.

We feel that Kimball County will have to increase their Police Force on the County Level.

The overall report was well written and the researched information seemed accurate.

BOARD OF COUNTY COMMISSIONERS
KIMBALL COUNTY, NEBRASKA

Lyle Shaw, Chairman
Vernon J. Bourlier, Vice Chairman
ValDeane Snyder, Member

LS:VB:VS:es

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

155

RECEIVED
OCT 21 1983
POLICY RESEARCH

MEMO

TO: Lyle Shaw

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, plase contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

RECEIVED
OCT 21 1983
POLICY RESEARCH

1 We have reviewed the Draft Environmental Impact Statement.

☒ No comment. at this time

☐ Comments are attached.

Name Lyle Shaw Title Chr, County Board

Office County Commissioners

Address Court House, Kimball, Ne 69145 Date 17 Oct 83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3414

156

Laramie County Wyoming

OFFICE OF
The Board of County Commissioners
ROOM 309 COURT BUILDING
LARAMIE COUNTY WYOMING
CHEYENNE, WYOMING 82001

JACK HUMPHREY CHAIRMAN
JEFF KETCHAM VICE-CHAIRMAN
SHIRLEY FRANCIS COMMISSIONER

REGULAR MEETING FIRST TUESDAY OF EACH MONTH

JANET C. WHITEHEAD
CLERK TO COMMISSIONERS
PHONE (307) 638-4260
P O BOX 608

URS - Berger
OCT 24 1983
Received

DATE: October 21, 1983

TO: All Elected Officials and Agency Heads

FROM: Shirley Francis

SUBJECT: Wyoming/Nebraska Socioeconomic Impact Study Response

I would like to preface my remarks by stating that it has been my first responsibility in conducting Laramie County's review of the WNSIS not just to adhere to one overriding requirement.

That requirement, for all County departments reviewing the document, is that comments must be based on the best information available. The MX proposition must be dealt with from a basis of hard fact. There is no time for playing games with numbers and surveys in the hope of producing a windfall of impact dollars to chase werewolves and dragons.

The real, probable impacts are of sufficient magnitude to warrant our full attention. I would like to submit the following comments as a synopsis of County review. You can, of course, find more detail by reviewing the reports of each department.

36 1. First, several reviewers have found that the definition of "impact", used throughout the document, is not specified. Varying degrees of this phenomenon are cited, among them "minimal" and "moderate". Precisely what yardstick is used to determine "moderate impact"?

805 2. Another common response is that a particular baselining study was either based on false assumption or was directed towards an inappropriate area or level of activity. Please take note of baselining study comments of the South East Mental Health Center, the City-County Health Unit, and the Cheyenne-Laramie County Planning Office.

600 3. All departments emphasize the fact that present facilities and services in Laramie County are stretched to maximum capacity for both space and personnel. Any increase in demand will cause deterioration of service. Please note in particular the comments about South Cheyenne from the Cheyenne-Laramie County Regional Planning Commission, the Fire Districts, the South East Mental Health Center and the sewer system.

"Laramie County ... The County with the Cleanest Air in the Nation."

Shirley Franess
Wyoming/Nebraska Socioeconomic Impact Study Response
Page 7

I would like to close with my own comment. Implicit in all the previous items is the new inescapable fact that the individual resident (and taxpayer) of Laramie County is used to and will continue to expect a certain return on his local tax dollar in the form of road maintenance, schools, hospitals, water and sewage service, law
601 enforcement, fire protection, library, and emergency service. As the elected representatives of the taxpayers the County officials expect to deliver the highest level of service possible with the available money. There is no way this level can be maintained at historic rates with the sudden intrusion of demanding agencies and needs without the accompanying injection of a taxable resource. Since no tax base has been offered, or can be, simple logic and justice require injection of resources to maintain adequate services. That is all that any of us ask.

Let's close on a positive note:

806 Regardless of the adequacy of the WASIS report, Laramie County has gained from it. It has brought us together to evaluate the resources and needs of our county. We are all wiser as a result of this exercise.

County Court
for
Laramie County Wyoming

FRANKLIN MOCKLER
JUDGE

6TH ST. AND CAREY AVE.
CHEYENNE, WYOMING 82001
307 638 4480

TO: County Commissioners for Laramie County
FROM: Franklin Mockler, County Judge
SUBJECT: MX Impact on the Laramie County Court
DATE: October 5, 1983

The Laramie County Court consists of one full time courtroom on the first floor and one courtroom on the fourth floor which is available three (3) weeks per month. The Court is split, with the civil department on the fourth floor and the criminal/bookkeeping departments on the first floor. The fourth floor has a large chambers and two very small office rooms. The first floor consists of one medium sized office and two very small chambers. In this space are four (4) full time civil clerks, two (2) full time criminal clerks, one (1) bookkeeper, and one (1) part time criminal clerk plus the two judges.

The Laramie County Court is the busiest County Court in Wyoming. The average number of felony preliminary hearings handled by this court is 32 per month. The average number of traffic tickets processed per month is 1,760, and of these approximately 10% are contested and tried. The average number of plea bargains per month is 22. Family Violence averages 9 per month, divorces average 38 per month and weddings average 14 in court per month.

In the civil area the average number of cases filed per month is 29[illegible]. This number has increased by 25% per year since 1980. Of these cases the average number tried is 80.

All felony cases are heard within ten (10) days after the initial appearance, all traffic cases are heard within two (2) weeks or one month and all D&UI cases are heard within six (6) weeks. Civil cases average twenty six (26) days before they are heard.

678 The impact study for the Air Force forgot to mention or include the civil cases. They also failed to consider that it is
675 anticipated that the District Court will require another judge by 1986, according to their predictions. This will eliminate the fourth floor courtroom for the County Court. Space is inadequate now and with the increases in County Court work, it is possible that by 1986 the county will need another county judge.

669 Using the mayor's figures, the MX will bring in a 15% increase in population and that increase will filter down to the County Courts as well. This increase added to the 25% per year increase in civil cases and our 14% increase per year in criminal cases (non traffic) will hit the court in 1985. (Booms have caused criminal cases to increase by up to 400% per year.)

680 In 1985, the County Court will be beyond it's capacity to function. We have purchased a computer to try and stay even at this point. We have no room for additional personnel and no room for our court now.

681 We presently need another courtroom and additional office space.
676 We project that by 1986, we will need two new courtrooms, another judge, and two more clerks. This is not all the fault of the MX. Planning for the future by the county has been non-existant.

The MX is going to cause a disaster for the County Courts unless work is started this year. Wyoming law requires Laramie

675 County to furnish us with adequate facilities. If the County does not move now, the State of Wyoming can and will sue them, making them divert their funds to the County Courts.

677 The study mentions night court and part time judges. This sounds feasible on first glance, however, there are inherent docketing complications and many other problems which have been ignored. Even if night court is only for traffic and criminal cases, the coordination and personnel required to administer it would far outweigh the benefits. Night court would cost the State of Wyoming as much as the court in Douglas costs now.

679 This study mentions that only 77% of the cases filed per month are tried per month. This is a statistician's delight. Of course, the figure is not accurate. It would probably closer to 66% of the cases filed are tried per month. There is naturally some carry over when cases are filed late in the month, however, this court hears cases in a very expeditious manner. If your figures were true, there would be 840 civil cases a year that never get tried and 211 criminal cases that never went to court.

158

Scotts Bluff County Commissioners

GERING, NEBRASKA 69341

October 6, 1983

Gayle Malmquist
Policy Research Office
Room 1321
State Capital
Box 94601
Lincoln, Nebr. 68509

RE: MX Review Document

Dear Ms. Malmquist:

Please excuse the tardiness in getting the comments regarding this matter to you, however, these documents were only recently received by me through an apparent mix-up in their earlier location.

818 I have reviewed the portion of the documents relating to Scotts Bluff County Government and find only a very few revisions. Specifically, in Section 8-3, the document refers to the existence of two judges in Scotts Bluff County. That figure is correct if only County Judges are addressed. There are, however, two additional judges who are District Judges. Further, under

819 Section 8-8, there appears to be a simple typographical error indicating that a number of cases are revised on appeal. The word "properly" should be reversed.

The other information presented appears to be reasonably accurate as to Scotts Bluff County Government and while I might disagree with the analysis made as to the relevant importance of some areas, the information presented is reasonably accurate. I specifically refer to the suggestion that there needs to be very little upgrading of certain roads connected with the project actually outside of Scotts Bluff County. It has been apparent for some

1009 time that one of the roads in Banner County, specifically the Pumpkin Creek Road leading from Highway 71 to the Wyoming border is, during certain critical times of the year, wholly inadequate to allow resupply of existing missile sites as well as access by Banner County residents. This route is heavily used by Scotts Bluff County residents since it allows for significant time savings in trips to Wyoming and the Denver region. It is very apparent that transporter loads as proposed under the MX System will acquire an upgrading of that facility. It might be appropriate to consider this road for upgrading to pave standards.

If I can be of any further assistance, please feel free to contact me.

Sincerely,

William C. Peters

WCP:cgb

159

Scotts Bluff County Commissioners

GERING, NEBRASKA 69341

October 6, 1983

Ronald A. Torgerson, Major, USAF
Deputy Director
Environmental Planning Division
Norton Air Force Base, Calif. 92409

Dear Major Torgerson:

I have examined the Socioeconomic Impact Study for the Peacekeeper Project provided me by your office with regard to the information pertaining to the Scotts Bluff County Government. Other than minor omissions

818 which are purely typographical in nature, I find only two errors which are of any real significance. Specifically, I refer to page 8-3 of the analysis of Scotts Bluff County Government in which there is a reference to the existence of judges in Scotts Bluff County as two. In fact, there

819 are actually four judges, two District and two County. Further, I found in paragraph 8-8, a reference to a number of cases which are revised. I am sure the author means cases reversed.

While I might disagree with some of the emphasis made concerning some of the information presented, the balance of the information seems fair and factual.

I might suggest that the Air Force might wish to consider an area in Banner County for additional consideration in upgrading road standards. Specifically, I refer to the road which is referred to as the Pumpkin Creek Road which runs from Highway 71 to the Wyoming border. This road

1009 is, at certain times of the year, marginal at best and, from time to time, virtually impassible due to the effects of moisture and road traffic. I would suggest that this road, which is heavily used in this area as a farm to market road as well as an alternate mode of travel allowing faster travel times to Cheyenne and the Denver area, be upgraded to paved standards which would also eliminate the potential impassibility of it during certain periods of the year.

If I can be of any further assistance, please feel free to call me.

Sincerely,

William C. Peters

WCP:cgb

160

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-332

161

The City of Cheyenne, Wyoming

MAYOR
CITY COUNCIL
JON ARMSTRONG
CAROLE CLARK
JOAN CLARK
JANE CRAWFORD
MARK GERTSCH
WANDA MCCUE
GEORGE SCOTT, NPD
RONALD N. ROGERS

MEMORANDUM
October 6, 1983

TO: Mayor Don Erickson

FROM: Jon Armstrong

SUBJECT: WNSIS COMMENTS - SOUTH CHEYENNE WATER AND SEWER DISTRICT

JA:lkn

34

Cheyenne-Laramie County Regional Planning Office

MEMORANDUM
October 6, 1983

TO : Jack Humphrey
Shirley Francis
Jeff Ketchem

FROM : Jon Aragon

SUBJECT: WNSIS COMMENTS - SOUTH CHEYENNE WATER AND SEWER DISTRICT

JA/lkn

2101 O'Neil Avenue Area (307) 637-6281 Cheyenne, Wyo 82001

WNSIS COMMENTS -- SOUTH CHEYENNE WATER AND SEWER DISTRICT

According to the WNSIS, the South Cheyenne Water and Sewer District (hereinafter referred to as "District") is to receive 60% of the project related growth. Peak immigrant population to the Cheyenne urban area is projected to be 3,781 in 1987. This will mean a settlement of 2,268 persons in the District. The current population of the District is approximately 6,700. The project will increase the population of the District by 34%. Baseline growth is expected to be 3,641 persons as well, of which the WNSIS also predicts 60% settlement in the District or 2,185 persons -- a 32% increase over the District's present population by 1987.

956 In other words, given baseline growth in the District the MX project will increase the District's population 25%. This is a rather heavy area-specific impact. According to the figures in the WNSIS, the District will be the most heavily impacted area in the region. If this is indeed the case, it is surprising that in the WNSIS only five pages are devoted to the District. Each impact category for the District is referred to the regional discussions found under the heading of Cheyenne or Laramie County.

The District represents a unique area that is developed to urban densities, but lacks standard urban facilities. The District presents a wide range of special considerations and concerns that need to be dealt with using an area-specific approach.

GENERAL GOVERNMENT

788 There is no discussion of the effectiveness of County government structure in dealing with the District's unique problems. The District is developed to urban densities and represents a disproportionate share of the County's population in a very small percentage of the County's territory. With the 25% increase in the District's population above a 32% baseline growth specific information is needed on the types of services the County government must provide to the District and the ability of the County government to provide these services effectively.

1151 The possibility of Cheyenne annexing portions of the District (Section 3.3.1.2) is not currently real. The consensus is that the annexation of the District will not occur until after 1991 -- after the impacts of the project are gone.

SEWAGE TREATMENT

919 The implementation of the 201 Facilities Plan will solve the Districts wastewater treatment problems. Analysis is needed of the District's wastewater collection system to determine its adequacy. The City's collection system is analyzed, the District's collection system is not. Given the disproportionate share of immigrants expected in the District, this analysis is needed.

918 The sewer line capacity data for the District could be misleading given the high infiltration/inflow in the District. This I/I must be considered. Sewer flows modelled on population only will indicate a more effective collection system than actually exists.

WATER DISTRIBUTION

907 There is no analysis of the District's water distribution system. Assuming distribution adequacy based upon flows at connection points to the City is misleading. The City's distribution system was modelled, the District's should be likewise. The District is currently experiencing seasonal pressure problems. These problems should be identified and mitigative measures outlined.

SOLID WASTE DISPOSAL

936 Under solid waste disposal, the reference is to the discussion of the urban system. The District is not really a part of the urban system inasmuch as private haulers are used (as mentioned in the WNSIS). Analysis needs to be made of the impact on private haulers, i.e., rate increases, less frequent pickup, and mitigative measures need to be outlined.

DRAINAGE

951 Increased population means increased housing, roads, etc. A detailed analysis of the effects of a 25% increase in development on drainage needs to be provided. The District represents a problem drainage area that is vulnerable to flooding.

952 The density assumptions in the drainage section should be revised to reflect the types of densities that are currently being developed.

LAW ENFORCEMENT

641 The reference to project impacts on the District in this category is found in Section 3.1.2.3. The project will increase demands on the Sheriff's office for criminal and traffic related offenses. The recommended mitigation is to place additional officers at I-25 and College Drive. The WNSIS does point out that construction projects bring in persons who are disproportionately represented in the jail population. Given the population and housing projections, the majority of these persons will live in the District. Many of these offenses (according to the WNSIS) are alcohol related. There is no discussion of how this disproportionately high crime rate will affect the safety of the long-term residents of the District and there are no area-specific recommendations for mitigation.

FIRE PROTECTION

689 Fire District #1 serves an area of 200 square miles of which the District constitutes about 7 square miles. More analysis on the ability of the present volunteer structure to serve the increasingly higher densities in the District is needed, especially given the projected increase in mobile homes which will result in even higher densities, more closely spaced housing units and access off of privately maintained streets. The addition of one pumper and three volunteers will not help if the emergency vehicles cannot get into an area to extinguish the fire.

LOCAL RECREATIONAL FACILITIES

There are none in the district and the County does not have a mechanism to develop and maintain them.

TRANSPORTATION

This has been addressed by the Transportation Subcommittee.

CONCLUSION

ADEQUACY OF PUBLIC FACILITIES (Generally)

956 This adequacy of the entire service infrastructure has not been addressed in the WNSIS. What is needed is a detailed analysis of the adequacy of the facilities in the District to serve a sudden 25% increase in population. As mentioned, the District is an area developed to urban densities but without urban regulatory controls or requirements. There are no sidewalks, roads are gravel, there are no parks, drainage problems are serious, the treatment plant is overloaded, water pressure is dropping, traffic control is basically non-existent, school children are bused out, the road system is congested, etc. The projected impact on the South Cheyenne Water and Sewer District will exacerbate all these problems, and it is questionable whether an area so lacking in public services should be targeted to receive the brunt of the impact without a detailed area-specific analysis. The District is to receive 100% of the low priced and temporary housing. This is bound to have far reaching effects and these effects are completely overlooked in the WNSIS, i.e., mobile homes are not taxed as real property, what effect will this have on the tax base?

The projected immigrant population to the City will result in a 3% population increase, yet there are at least 100 pages devoted to impacts on the City. The projected immigrant population will result in at least a 25% population increase in the District, yet there are only 5 pages of the WNSIS devoted to the District with scattered references throughout. The District poses and will continue to pose unique problems due to its unique situation.

The WNSIS is completely inadequate in relation to the District because it has failed to address the District's unique, area-specific problems and as a result has offered no mitigation strategies suited for this most heavily impacted area in the region.

162

Cheyenne-Laramie County Regional Planning Office

MEMORANDUM
SEPTEMBER 19, 1983

TO : Roger Peterson, Assistant City Engineer
FROM: Jon Arason
RE : Density Assumptions in Project Impacts, Section 3.2.5.3 of the WNSIS (Under Drainage, Pages 3-79)

MOBILE HOME DENSITIES IN THE SOUTH CHEYENNE WATER AND SEWER DISTRICT:

There are two types of mobile home development going into the District--Parks and Subdivisions. Of the estimated 1,075 new mobile homes projected in the WNSIS assumed density can change depending on whether or not these homes are in parks or subdivisions.

333 Recent subdivisions in the District have been developed with an average lot size of 5,500 square feet, and an average density of about 4.7-5.0 lots/acre (including streets).

Mobile home parks are developing with lot sizes in the 3,200 to 3,700 square feet range and an average density of around 8.0 lots/acre. Of course, if one wished to maximize the number of lots it would be possible to develop mobile home parks to densities up to 10 lots/acre--assuming that 30% of an acre of development goes to streets, this leaves 30,492 square feet (43,560 x .70) for lots. The minimum lot size is 3,200 square feet or 10.16 lots/acre (30,492 ÷ 3,000).

On a mobile home lot, there is a good deal of impervious surface. On a 3,700 square foot lot, it is possible to place a 12' x 70' home or 840 square feet. The two car parking pad would be 20' x 20' or 480 square feet for a total lot of impervious surface of 1,320 square feet. 44% of the lot. At a density of 7 lots/acre this would be 12,320 square feet of impervious surface and 11,068 square feet for roads or a total of 20,260 square feet of impervious surface/acre. This does not include patios, ramadas, storage sheds, etc.

OTHER PROJECTED HOUSING DEMAND:

1147 The WNSIS also makes the assumption that all of the new housing will occur in Northeast Cheyenne. This is not a reasonable assumption based on current developments.

50

2101 O'Neil Avenue Area (307) 637-6281 Cheyenne, Wyo 82001

OTHER PROJECTED HOUSING DEMAND (CONTINUED):

1147 In Cheyenne we are seeing triplex developments and townhouses. Four-plexes are built on 10,000 square feet lots, single-family homes are built on 5,000 - 7,000 square feet lots. I do not think that this trend will change in the near future.

In conclusion, I think that the density assumptions made are somewhat inaccurate. I do not know how changing the density assumptions will change projected runoff, but given the time of development now planned or being built, perhaps the density assumptions in Section 3.2.5.3 should be changed.

952

JA:lkh

51

163

STATE OF WYOMING
TORRINGTON

GOSHEN COUNTY

TORRINGTON, WYOMING.

October 7, 1983

Ronald A. Torgerson, Major, USAF
Deputy Director-Environmental Planning Division
Norton Air Force Base, California 92409

Dear Major Torgerson:

The following corrections and comments concerning Goshen County are respectfully submitted:

665 S-1.1.1.3 Correct existing courthouse from 21,450 s.f. to 11,700 s.f., of which 3,900 s.f. is administration.

773 The County shop is inadequate to service and repair equipment of the size common to todays construction.

S-1.1.1.4 The county is unable to replace most equipment and vehicles when necessary, especially in the road and bridge department.

832 S-1.1.2.3 The addition consists of approximately 21,450 s.f.. A new jail facility will be required in the near future in order to fulfill the county's requirements for national jail standards.

774 S-1.1.2.4 Replacement of capital equipment will be very difficult, due to anticipated revenues being rather stable or decreasing, but equipment costs continually rising.

773 S-1.1.3.4 Increased road maintenance requirements will more than strain equipment inventory. It will be impossible to expand to meet the required needs.

832 Appendix D - Goshen County Courthouse, Description of facility: Correct to: Site 1 acres; Building: 11,700 s.f.; Date of Construction: 1913.

Goshen County Jail: Building - 6,000 s.f..

Sincerely:

Wendell E. Grapes
Goshen County Clerk

WEG/ad

164

LARAMIE COUNTY/CHEYENNE CIVIL DEFENSE
318 W. 19th St.
CHEYENNE, WYOMING 82001

DATE: October 5, 1983

TO: County Commissioners

FROM: David M. Guille, Director

SUBJECT: Wyoming-Nebraska Socioeconomic Impact Analysis

We have looked over the three (3) volumes of the report submitted by the Department of Air Force, and we find that the information is going to be extremely helpful in times of emergencies or disaster: using the criteria to establish resource information.

There is one exception to this report, and that is primarily dealing with the Laramie County Civil Defense facility. In the summary of adequacies, we find that more time should have been devoted in explaining this area.

780
1) In a disaster or total emergency, the Civil Defense facility is too small to accomodate all of the department heads and elected officials, to conduct an operation.

2) The E. O. C. (Emergency Operations Center) facility, is not complete. At one time we did have Decontamination showers, and sleeping facilities which were transformed by the previous Sheriff into Labs.

3) We have also lost a radio room space, which is now the new freight ramp in the back of the building. To facilitate an amature radio area, portable walls had to be installed to accomodate radio operations.

777 The day of construction is incorrect. The remodeling of and the addition of the existing facility, which now houses Civil Defense and the administrative offices of the Sheriff's Office, were built in the mid 60's.

786 The 911 Emergency Center, is the county warning point and with continued expansion and responsibility, the area is becoming very cramped. In this report, it shows the level of service to include nine (9) employees. this break down must be corrected to show six (6) employees in the 911 Center, and three (3) employees in the Civil Defense department.

778 To show the year 1995, as being a feasable time period for expansion is totally inaccurate and should be reassessed.

780 The three (3) Volumes, as I mentioned earlier are important as far as resources are concerned, however the Department of Air Force, does not address a total civilian emergency preparedness concept.

165

[illegible] Toby Haksmins
Laramie County Fire Warden
2313 Deming Blvd.
Cheyenne, WY 82001
Phone (307) 632-4554 October 3, 1983

TO: Shirley Francis
FROM: Toby Haksmins
SUBJECT: Wyoming-Nebraska Socioeconomic Impact Statement (WNSIS)

The WNSIS does not adequately address the increased demand for Fire Protection and Rescue Operations in Laramie County, due to the following:

A. Increased population and activity in all of Laramie County will increase the exposure for fire and rescue operations of all types, which will require additional funding for the following:

692

1. Fire Districts and Fire Zones
   a. Additional Fire and Rescue equipment
   b. Additional housing for Fire And Rescue equipment
   c. Training for additional Volunteer Firefighters
   d. Equipping additional Volunteer Firefighters
   e. Additional operating expense

2. Fire Warden
   a. Office Space
   b. Secretary
   c. Operating expense

Toby Haksmins
Laramie County Fire Warden

166

County Court
for
Laramie County Wyoming

ROBERT W. ALLEN
JUDGE

309 ST. AND CAREY AVE.
CHEYENNE, WYOMING 82001
(307) 638-4736

TO: The United States Air Force, The Laramie County Commissioners, and whomever it may concern
FROM: Robert W. Allen, Laramie County Judge
DATE: October 5, 1983
SUBJECT: Impact on MX on Laramie County Court

After reviewing the September 1983 Wyoming and Nebraska Socioeconomic Impact Study, I am pleased to see that the drafters of this voluminous study realize that there will definitely be an impact upon the Laramie County Court during implementation of the MX.

By way of background, there are presently two full-time judges (Judge Franklin Mockler and myself) and a county court commissioner (Municipal Judge Paul Galeotos) who fills in for the county judges from time to time as our docket requires. The court conducts trials on all alleged violations of the state traffic code, state misdemeanors, (any crime punishable by up to one year in the county jail), and family violence situations (where it is alleged that family members or people living together have battered one another). County court conducts the initial court appearances for all persons accused of felonies (murder, rape, robbery, arson, etc.) in which the accused is informed of his/her rights, appointed a public defender if necessary, and bond is set. County court also conducts preliminary hearings on felony cases in which the county judge determines whether or not there is sufficient evidence to send the case to the district court for trial. The socioeconomic impact

stud[illegible] correctly points out that due to the above cases, the missile project will create a substantial impact upon the Laramie County Court. The study suggests that a part-time judge will be needed. I urge that monies be provided for a part-time judge to the equivalent of one-half judge for the five year impacted period. County judges presently are compensated at $40,000 per year. I request $20,000 per year for the five year impact period beginning in 198[illegible] and continuing through 1988. That would be a total appropriation of $100,000. The Laramie County Court handles more cases than any other court in the State of Wyoming. The present docket is at it's maximum, and another part-time judge will be required because of the impact.

668 Actually the part-time judge would spend only about one-half of his/her time on the above-mentioned duties. The impact study did not mention the civil law (law suits) impact on the Laramie County Court. The Laramie County Court has jurisdiction to hear civil law suits up to an amount in controversy of $7,000. This includes small claims, which technically have a threshold of $750.00. In 1982, the Laramie County Court had over 3,000 civil cases filed and processed. That figure is progressing upwards and in the near future could easily surpass the 4,000 caseload figure. The missile impact will raise the number of civil cases filed, not only in the areas of landlord-tenant disputes, construction project disputes, fender benders, and bill collections, but in all civil areas. A part-time judge equivalent to one-half judge will be absolutely necessary due to the missile impact. This is a conservative estimate.

675 There is one other aspect of the missile impact that must be addressed. Room. We are presently extremely overcrowded. We have two judges, seven full time clerks, and one part-time clerk. The two full time criminal clerks, the bookkeeping clerk and the part-time clerk are presently crammed into one very small working area. The four full time civil clerks have even less space in an area which we presently have on loan from the district court. How long we will have this borrowed space is unknown, but if we were to be told that district court needs the space, we would have to simply shut down the civil division as there is no space available to operate. Even if the county court is permitted to use the borrowed space, the missile impact will be the large straw that will break the camel's back and more space will be absolutely essential due to the impact.

What is needed is space equal to one floor of the present county building. The county court must stay in the county building because this is where the jail, the district attorney, and the district courts are located. The county commissioners would be amenable to giving the county court more space if any space was available. Presently there is no space available in the county building and with the impact due to the missile project, it will be necessary for the federal and county government to provide more space for the county courts.

681 The missile impact on the county court's criminal and civil docket will necessitate that the county court be given space on one full floor of the county building. Approximately $60,000 per year will be needed to pay the rent in a building downtown for the county administrative offices (non legal in nature) which

will have to be moved out to give the county court the one floor that is necessary. That is only a ballpark figure but over five years, $300,000 for rent will be necessitated.

Once the administrative offices are moved out, it will cost approximately $50,000 to remodel another courtroom on that floor. The county court presently has one courtroom and we are allowed to use a district courtroom when it is not in use. Therefore, we presently have two judges and 1½ courtrooms. During the impacted years, we will need 2½ judges and 2 county courtrooms.

672 Therefore, the total amount needed due to the impact for the Laramie County Court is $450,000 broken down as follows:

1.	One-part time judge at $20,000 per year for five years	$100,000
2.	The rent for administrative offices to locate in another building at $60,000 per year for five years	300,000
3.	The cost of remodeling a courtroom so the county court has two courtrooms	50,000
	TOTAL	$450,000

If the impact occurs as predicted by the impact study, and if the Laramie County Court does not receive the $100,000 for a part-time judge and one full floor in the county building remodeled in order that the county court has double our present administrative space and two county court courtrooms, the citizens of Laramie County will receive either substandard service or no service at all. If the lack of space problem gets any worse, the state may have to force the county commissioners to provide facilities for the county courts. Hopefully, this problem can be averted, but I believe I would be remiss not to point out this critical and very possible situation. The time for planning and well-intentioned promises has passed. The time to act is now.

LARAMIE COUNTY ENGINEER

167

Laramie County
Road & Bridge Building

706 West 9th Street
Cheyenne, Wyoming 8200[illegible]

October 5, 1982
MEMORANDUM

FROM: R. H. Whitney, County Engineer

To: Board of Laramie County Commissioners

Subject: Proposed Improvements of Defense Access Roads for the Peacekeeper Missile in Minuteman Silos.

1061 The proposed placement of the 100 Peacekeeper missiles in Minuteman Silos located in 3 counties: Goshen, Laramie, and Platte in Wyoming and 2 counties: Banner and Kimball in Nebraska is going to require considerable improvements to the access roads that are the responsibility of the counties.

This plan will place 13 of the missiles in Laramie County.

For the placement of the Minuteman only one large vehicle was needed. The Minuteman Transporter Erector had a gross loaded weight of 125,000 pounds, is [illegible] feet 9 inches long, 10 feet 2 inches wide and 13 feet 6 inches high. The vehicle has eight axles with 18,000 pounds per axle on the loaded axles and trailers equipped with four wheels. The missile was hauled to site fully assembled, except for the warhead, for placement in the silo.

The Peacekeeper missile, however, will be hauled to the silo in [illegible] components and will be assembled at the silo site. There are eight large and heavy service loads proposed for the hauling of the components and support vehicles for the assembly of the missile. Five of these loads will be transported in the Peacekeeper Type II Stage Transporter.

The greatest load to be hauled by this transporter will have a gross loaded weight of 125,000 pounds, an overall length of 78 feet, overall width of 13 feet 2 inches and overall height of 14 feet 3 inches. This transporter is an eight axle vehicle with [illegible] pounds on the loaded axles. Five of the axles will have this maximum load and it is to be distributed to eight wheels mounted on [illegible] transporter. There are [illegible] five axles to distribute [illegible]

The rest of the vehicles of the emplacer, the shelter, and the support vehicles will not approach the weight and [illegible] heavy and of duration on fewer axles.

[illegible] and Defense Access Road Needs Report five [illegible] roads [illegible] access roads should comply with AASHTO standards. This specification will require a road section having a road surface [illegible] feet wide [illegible] a roadbed width of 28 feet.

[illegible] of the roads in Laramie County are frequently used by the Minuteman Transporter-Erector and are planned to be used for the transports and erection of the Peacekeeper. Approximately [illegible] of this mileage is asphalt paved and 178 miles are gravel surfaced.

Of the total, [illegible] miles, only 20 miles have a roadbed width of 28 feet or greater. In fact, approximately 70% are less than 24 feet wide and the majority of the roadbeds are from 20 to 22 feet wide.

Roadway drainage pipe is another item that will require consideration if it has been determined that approximately 130 pipes do not have adequate cover for the new axle loadings, and additional fill averaging 1 foot in depth is needed.

The survey prepared by the consultant also reported that 13 curves on the county roads are substandard due to their small radius of sloped super-elevation.

To correct just these indicated deficiencies on the roads of Laramie County is going to require road reconstruction of major magnitude.

Because a large number of defense access roads will be maintained by Laramie County by its road maintenance forces, considerable expenditures for equipment and personnel will be required. Of the tabulated 160 miles of access roads in the county only 15 miles are maintained by the Air Force.

Gravelled Roads have such maintenance problems as:

1) Regular blading to remove ruttine caused by traffic and especially heavy truck traffic.

2) During periods of heavy rainfall the roads become soft and subject to displacement by even moderate traffic. Melting from snowdrifting on the roads can be equally destructive.

3) Gravel Surfacing of the roadway top is lost by wind erosion, maintenance blading operations, and by the low profile snowplowing required by present-day automobiles.

1026 For these reasons it is recommended that serious consideration be given to asphalt paving of the access roads.

If an assumed life of these access roads and, perhaps, also of the Peacekeeper deployment is estimated at 20 years, the following figures are presented for consideration.

1) The county's average cost of maintaining a gravelled road is $1500 per year per mile and for a paved road, it is only $300 per year per mile. For the twenty year period the cost differential would be $24,000 per mile.

2) This year the county placed 2" thick hot plant mix bituminous pavement, 22' feet wide in a rural area at an average cost of $50,300 per mile. For low volume traffic this road is expected to have a life of 20 years with little or no maintenance.

3) Gravelled roads will require regravelling 2 to 3 times within the twenty year period. The Federal Highway Administration, for its 1981 program of regravelling defense access roads, estimates that it will cost $15,000 per mile for a 3 inch thickness of gravel.

The above figures, though approximate, indicate that for a twenty year period, the cost of a paved road can be equal or less than the cost of a gravelled road.

A road system that was only [illegible] all-weather, as proposed in the report, would be nearly [illegible] all-weather by building four seven foot [illegible] roads.

The Impact Study in Section 3, Public Capital Equipment, Laramie County states, "No major expansion of the existing road and urban Department roads during the analysis period of 1981 to 1991 is projected." Only by requiring the maintenance of the defense access roads during the Peacekeeper construction period could Laramie County service them with it's present strength.

779 Should gravelled roads be the choice, the County will surely have to consider additional equipment and maintenance personnel.

In consideration of the above facts, the decision of road type should be thoroughly reviewed and the County should recommend all weather paved defense access roads in Laramie County for the installation of and operational access to the Peacekeeper missiles.

Clerk of the District Court First Judicial District
Laramie County
168
Laramie County Courthouse
19th and Carey Ave
P. O. Box 743 Phone 307/638-4279
Cheyenne, Wyoming 82003-0743
GERRIE E. BISHOP
Clerk

October 12, 1983

Re: Wyoming-Nebraska Socioeconomic Impact Statement

666 In a brief review of the WNSIS, I find the Clerk of Court office has been completely ignored as being a part of Laramie County Government. On page 3-8 there is NO mention of the Clerk of Court office.

District Courts and the Clerk of Court office is mentioned on page 3-359.

169

LARAMIE COUNTY FIRE DISTRICT 2
3847 YELLOWSTONE
CHEYENNE, WY 82001
307 632 5400

October 6, 1983

Commissioner Francis
7rd West 19th Street
Cheyenne, WY 82001

Re: Wyoming-Nebraska Socioeconomic Study

Commissioner Francis:

I appreciate the opportunity to review the impact study on the Peacekeeper Project and my comments are directed to those issues effecting the county fire service.

My initial impression is that the surveys of the county fire departments are incomplete. The remainder of the studies addressed in the Laramie County section are indepth, studying a multitude of areas such as; the efficiency involved in combined microfilm services of city and county government to the number of 16mm film projectors available at our local library. It would appear that the report does little more than recognize the existence of county fire departments and has eliminated several areas of particular concern expressed by our department.

According to the report, Fire District 1 is the only fire department to receive any upgrading of fire equipment, man power and facilities. It should be noted that this district had sufficient funding potential available in the past to meet the needs of the increased growth of their district and allowed themselves to fall behind in modernization of equipment and firefighting techniques. However, we fully support any and all measures that would improve equipment and services to this district and feel that they should receive top priority over all local fire services, city and county, due to their projected residential growth.

In dealing with our own district, I consider the report complimentary in the fact that we have met our current and projected needs in reference to our equipment and man power. However, in our initial conservation with Mr. William Moore of URS Engineers, additional arrangements were made to tour our stations and obtain additional information, which never materialized, therefore, the following facts were not obtained.

690 According to the population study referenced in 3.3.1 of the Impact Report, Laramie County population increased approximately two per cent a year from 1970 to 1980. The predicted growth is expected to exceed two per cent annually

VOLUNTEER FIREMEN — WE'RE READY WHEN YOU NEED US

without the Peacekeeper Project from 1980 to 1995. Based on the study from our departmental records for a five year period from 1978 to 1982, calls have increased 5% per cent with little significant change in our budget. If the current trend continues, calls from 1984 to 1989 could increase from last years total 274, to 400. While it may appear that 274 calls is a small amount, it becomes apparent that emergency responses are only a part of the activities involved in a volunteer department. At present all positions, with the exception of a paid part time secretary, are volunteer. During this same time period the number of donated man hours that it takes to keep our department operational has increased from 4,124.6 hours in 1978 to 21,932.3 hours in 1982. Currently our 1983 average is approximately 1,900 to 2,150 man hours per month. Hours include emergency responses, training, vehicle and station maintenance, and departmental work projects. It should be further noted that we have not increased the number of volunteers during this five year period. At the present time we have reached a plateau for the amount of time that we can expect our volunteers to give without increasing our department size. There is sufficient work to keep two full time people busy conducting department business and maintenance on vehicles in stations. While most volunteers realize the financial situation will not allow for such positions, they also realize that at some point other arrangements have to be made to contend with the increased calls and related activities to lessen the demand for their personal time.

690 The study projects most growth to be within city limits and in south Cheyenne. It further indicates the need for major rural road upgrading, the obvious site construction work, and the increase of traffic to and from those locations. At present, District 2 is the only county department directing full attention to improve rescue services. Annually 2% per cent of our calls are out-of-district and this percentage is expected to increase, particularly with construction site accidents and increased vehicular accidents. We would also anticipate an increase in mutual aid response because of the capabilities of our rescue squad. Because of the increased demand for our services and the large area which we cover, encompassing a majority of the interstate systems and the heavily traveled secondary highways, our plans call for development of a second rescue unit beginning next year (1984-1985). Consideration should be given to purchasing a heavy duty rescue truck for the purposes of city-county responses requiring heavy duty capabilities. Additional consideration should be given to at least one small rescue unit in or near the Pine Bluffs area to handle rescue calls on an initial basis until additional needed equipment can arrive.

Section 3.2.8.1 reviews the Cheyenne Fire Department and makes reference to mutual aid between the city and county fire departments. It is my opinion that the present agreement does not address the needs of the community and could be labeled as ineffective, inefficient, and virtually nonexistent. The communications between departments is poor and no fire preplanning and cross training exists in areas that would require mutual response. While both Chief Carey and myself realize the need to improve our mutual aid commitments, our efforts to do so have not met with favorable approval by representatives of the local firefighters union and consequently our efforts have been unsuccessful. It appears at this point that for this issue to be formally resolved, it will have to be a part of the local firefighters union contract negotiations. It is my sincere belief that the resolution of this particular issue will enhance the quality of emergency services in the Cheyenne area significantly at no additional expense to the taxpayer.

690 I feel that a more complete review of all fire departments activities, especially in the Cheyenne area, is in order to properly evaluate the need of man power, equipment and facilities.

Respectfully,

Jay Scott
Chief

JS:er

cc: Tony Miskimins
Laramie County Fire Warden

William A. Moore
URS Engineers

Laramie County School District Number One

Administration Building 2810 House Avenue Cheyenne, Wyoming 82001
(307) 632-0591
170

Byron A. Barry, Ed.D.
Superintendent of Schools

Assistant Superintendents
Robert G. Affierbach - Instruction
Dean E. Conine, Ed.D. - Business
Richard W. Johnson - Personnel

October 14, 1983

RECEIVED
OCT 17 1983
LARAMIE COUNTY SCHOOL DIST. #1
ENGINEER OFFICE

Major Ronald A. Torgerson
United States Air Force
Deputy Director
Environmental Planning Division
Norton Air Force Base, California 92409

Dear Major Torgerson:

The following are our comments and concerns concerning the Wyoming and Nebraska Socioeconomic Impact Study. First, I would like to primarily address Section 3.8.1.4, Mitigative Measures found on page 3-243 of the study:

1. The hiring of approximately 50 full-time classroom teachers. The document suggests that care be taken so that the District is not left with tenure teachers four years later.

606 Comment: We are concerned as to what care could be taken so that the District would not be left with tenure teachers. It would be very difficult should the 50 teachers be needed. If teachers have the opportunity to sign their fourth contract, we would automatically be left with tenure teachers. A suggestion as to how this could be avoided is not forthcoming from this document. Combined with our thinking along this line would be the quality of these teachers. We would not want to hire those teachers with the understanding that they would probably be dropped at any given time. We would continue to pursue top quality people for our teaching positions.

2. The document suggests that there would be 12 additional certified staff needed in the area of special education and counseling. At least some of them would be needed there and 25 noncertified staff.

605 Comment: We are not sure if we are talking about full-time people. If we are looking at part-time people, this could cause the District additional funding in benefits. We perhaps would like to see just exactly what we are talking about when they say "some" in the area of special educatic --what part of the 12 equals "some"?

610 3. This concerns the rental or purchase of modular units to increase available space.

-continued-

610 Comment: One must be aware of the fact that even though you add modular units whether they are classrooms or office space, then you must consider an additional impact on the special areas of the building, such as music rooms, gymnasiums, and other special areas. The District has already taken a number of steps to relieve the office space need by using the District Industrial Building Class to construct such office areas. We would say primarily our need would be classrooms and hence an additional impact on the other special areas of the building.

4. The remodeling of the existing facilities to increase space.

607 Comment: Just exactly what space are we talking about in terms of remodeling? Other than the condemned old Johnson Junior High building, we are not aware of any available space to be gained through remodeling of existing facilities.

5. The renovation of existing facilities to increase space such as renovating old Johnson Junior High.

613 Comment: The study itself points out the cost. Into the cost one would have to add a fire code and building code search which would certainly need to be done and a document published on just exactly what would be necessary to bring this building to a safe and satisfactory situation. In addition to that, we in the District feel that there would be extreme parental pressure to not move students back into this building. The voters of the District approved the new Johnson Junior High on the basis that the old Johnson had been condemned. To now turn around and go back in and place students in there in nearly any kind of a condition, would result in a great deal of negative feeling on the part of the patrons.

6. The rental or purchase of additional buses.

623 Comment: I question that the term rental should be used at all. I am not aware of any organization in the near vicinity that rents school buses. So, we in turn would be looking at the purchase of additional school buses, and when we purchase additional buses, we must also consider where those buses are to be housed since our bus garage is at maximum at this point. Additional maintenance will be required and additional personnel to maintain and operate those buses. Type and size of buses needs to be specified.

7. Temporarily reassign special program space to general classroom space and share special program space with other facilities.

614 Comment: We frankly don't see how this could be accomplished. The suggestion made by the document that we could share with Laramie County Community College ignores the fact that Laramie County Community College is using their own space for their program, I am sure a majority of the time, and their schedules would be in direct conflict with our schedules. In addition to

-continued-

614 the scheduling adjustments, the time required to transport any of our people to those special areas and back would be a real negative factor. We would argue the fact that this is not a viable mitigation procedure in any way.

8. Payment of tuition to enable them to attend private schools.

619 Comment: The only way such a program could operate would have to be strictly voluntary. In no way could we, in the public schools send students to private schools and pay their tuition without some sort of guarantee that the public school curriculum would have to be followed. This would in turn negate the offerings of some of their various religious offerings and activities during the day. In addition to that, probably the only possibility of a private or parochial school in our area accepting any number of students at all would be St. Mary's and Seton High School. This particular mitigation procedure would be extremely limited also in terms of pupils available to participate in such a tuition program.

626 Our overall feeling about the mitigation measures offered by the document is that it does not seem to recognize that there will be a need for expansion of programs and there is no projection in the document concerning this. The document does not address our food service program at all, which in turn will
624 be impacted much the same as transportation. It seems to project the thought that we would more or less buy a gift buses when in reality a great deal more would be affected through a change of routing, additional housing, additional maintenance, additional personnel, etc. It does not address the issues of equipment
622 and material. These two items for 940 students would be substantial and would
627 certainly be an impact. Additional students accompanied by their families makes for higher use of the school facilities by the community, so increased community use of the buildings is also not addressed.

615 Since the City Recreation Program is dependent upon school facilities, a more in-depth study of additional space needs, added maintenance and custodial cost is necessary. It would seem that although our space standards are accepted in one section of the document, mitigation measures at the conclusion of the document do not adequately address our present space inadequacies nor projected enrollment increases. There has been no review of the school sites to establish adequacy for additional modular units or needed playground space. This should be reviewed under State Department of Education rules and regulations for site selection, school construction and remodeling. Student safety traveling to and from the sites must be given priority considerations. We have stressed and will continue to stress that in order for mitigation to be adequate, quality must not be reduced.

We thank you for the opportunity to provide our input into this document and look forward to discussing it further at the scheduled meetings in the future.

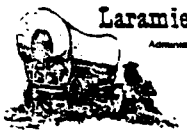
-continued-

I have appreciated the Air Force's cooperation with us in the past and will continue to anticipate the same good cooperation in the future.

Sincerely,

Dean Conine, Ed.D.
Assistant Superintendent for Business Services

mr



Laramie County School District Number One

Administration Building 2810 House Avenue Cheyenne, Wyoming 82001
(307) 632-0881

171

Byron A. Barry, Ed. D.
Superintendent of Schools

Assistant Superintendents
Rob rt G. Marbach - Instruction
Dean E. Conine, Ed. D. - Business
Richard W. Johnson - Personnel

November 22, 1983

Air Force Regional Civil Engineer
Ballistic Missile Office
Environmental Planning Division
Norton AFB, CA 92409

Dear Sir:

Please accept some additional comments to the Draft Environmental Planning Statement. I am including our original comments again for your convenience.

Mitigation Issues:

516 1. No enrollment increases due to the project have been indicated before 1985. We question the accuracy of this, taking into account the unemployed in migrates that arrive due to the presidential announcement of location and the actual construction schedule for road construction.

412 2. As our foundation funds are determined for a whole school year on the average daily membership of the previous year, any increase in enrollment after that will not generate additional monies unless the enrollment increase is 15 percent more 60 days after the start of school. This funding does not allow increases in funding from the State Foundation during the spring months when increased construction activity and related increased student enrollments are anticipated. Mitigation measures need to address this issue under the public finance section.

517 3. As large numbers of students may enroll after the beginning of a school year, the impact of this constant interruption to the classroom and school needs to be addressed. Additional staff people may be needed to establish placement in special programs if students do not bring their past records. This

518 continuation of student arrival will greatly affect our bus routes, as bus capacities are exceeded and new routes may need to be established or changed during the year. Mitigation measures should address the busing problem.

519 4. Food Service - As our food service has increased their meals substantially the past two years and now are nearing their capacity in our preparation kitchens, mitigation measures should address the impact on our food service.

520 5. Student enrollment increases should not only include those that are a direct result of the MX, but those that are generated because of project related projects, such as the increased population to build a new school, update a water system, additional police or fire service which are only required now because of the project. These students are just as big of an impact on our schools as those that are directly project related. Any construction at Warren AFB should also be included as these areas all are for the support of the bases mission. Mitigation measures should address these "project related" population increases.

521 6. A review of possible public or private uses of Johnson Junior High School has not been adequately addressed through the potential mitigation measures in areas such as public health, parks and recreation, housing, etc. We request that its potential use be appropriately listed in other mitigation measures.

522 7. The general residential locations of the students generated by the project and related projects, should be identified.

523 8. The impact of the Presidential Commission on Excellence in Education should be reviewed and its related impact on the building capacities.

150 9. The impact is assumed that the ambitious schedule will stay on track; if because of weather, delay in Congressional funding, labor strikes or any other cause, the project will need to be condensed into a smaller time frame. The EIS does not address how changes in the mitigation measures would be addressed.

524 10. The statement that our new elementary schools are "state of the art" is not quite accurate as they were based on our 1982 education curriculum and changes have been made to require some modifications already, even before they have opened.

525 11. The possible need to expand the school schedule on the secondary level to accomodate additional students does not address the changes in busing, after school jobs, the hiring of additional staff and requirements of school certification (North Central) itself. The mitigation measures should also include the mitigation as set forth in certification standards as the number of instructional periods and preparation periods. The impact of part-time staffing should also be addressed.

589 12. The suggested project of a 35,000 square foot building to be purchased in 1988 does not state to what need it will address, also the 1988 time frame is too late to be of assistance during our peak impact year. Mitigation measures must take timing into consideration.

Mitigation Finance Measures:

1. A direct grant from the Air Force, Defense Department or Congress to the local school districts as was done for the Trident Base in Washington.

2. The building of additional new schools or the addition to existing buildings to provide the required space.

3. The requesting of federal funding by federal agencies, by the Air Force or Defense Department and not the local public agency.

4. The purchase of required materials, books and equipment for the increased students must also be addressed.

503 5. With the age of most of our facilities and the lack of funds committed to the maintenance and improvement of these buildings over the past 20 years, increased financial resources from the District will be needed to keep our existing facilities in operation. These required monies will substantially take away from the available monies for new construction in the future. The public finance section does not adequately address this important area.

6. The review of the actual education cost per year should be reviewed and listed in the possible list of mitigation measures.

7. Cost of employee benefits are not addressed.

8. An analysis is not made on the impact of the project on the State Foundation Program itself and the political reality of the possibility of a change in the formula dealing with P.L. 874 monies.

9. All through the EIS it is assumed that all available resources such as unassigned tax dollars, facility space, manpower and volunteers are available for the project. It does not take into account the accelerated needs of the community to draw upon these same resources--thus driving up the cost of a new or remodeled school or the availability of qualified teachers or the dollars available for a much needed expanded program. The mitigation measures should address these areas.

503 10. We question the accuracy and the rationale for projection of State Foundation Program, especially in light of our own projects which indicate a loss of nearly $3 million this next fiscal year because of the dissolution of the 308J funds (special education).

11. We have currently utilized 62.1 percent of our legal debt limit with $3.6 million indebtedness capacity remaining. This is substantially different than stated in the EIS.

It is vital that all concerned be aware of the timing that many of the mitigation suggestions require. Just as the Air Force requires that many requirements must be met before the missile can be operational in 1986, we also must have decisions made immediately so that we are ready before the impact, not after. Any building project that the District must accomplish should have been underway before now.

Thank you for your consideration of our comments.

Sincerely,

Dean Conine, Ed.D.
Assistant Superintendent
Business Services

klk

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Laramie County Community College
1400 East College Drive Cheyenne Wyoming 82007 (307) 634-5853

MEMORANDUM - November 16, 1983

TO: State Planning Coordinator

FROM: Arthur H. Ellis, Associate Dean for Educational Development
Oliver Sundby, Wyoming Community College Commission

SUBJECT: MX Impact Document Review

The Peacekeeper Impact Study specifically mentions the role of the unions in supplying trained personnel and also mentions their training programs.

The Wyoming Community College Commission, however, was not mentioned and, therefore, this report was written as a part of the Community Profile.

The Mayor's Peacekeeper Impact Employment and Training Committee believes that there is a labor pool available for the Peacekeeper construction and maintenance program. It further believes that there are adequate opportunities to train local residents for employment in the program. Advance notice of employment needs and assistance with financing and equipment would help tremendously in any training endeavor.

It is anticipated that the secondary employment market will also be impacted and training in those areas would also be available.

Retraining after the exodus of the construction program is anticipated also in that we expect when the peak need for employees drops, many families will attempt to "stay on" in Cheyenne seeking alternative employment and/or assistance. 235

A major training organization in the Cheyenne area is Laramie County Community College. LCCC has a recognized history of gearing up for special programming. Special programs have been developed and presented to or for:

- Apprenticeship Programs
- Associated General Contractors
- Alpine Designs
- Wyoming Hospital Association
- Burlington Northern Railroad
- Mountain Bell
- Realtors
- Small Business Administration
- Law Enforcement Agencies

MX Impact Review Agencies
November 16, 1983
Page Two

- Banking Institutions
- School Districts
- Wycon Chemical
- Warren Air Force Base
- State of Wyoming

The college also has a history of cooperating with other agencies to develop quality target training and employment skill development.

It is anticipated that the college will be very eager to prepare persons for employment both prior to and after the Peacekeeper's impact and would draw on the facilities and expertise available.

College officials point with pride to such involvement and cite it as a part of their philosophy and mission. As a result, innovative, non-traditional scheduling and intensive short programs and courses have been successfully conducted.

A cooperative spirit exists between the Cheyenne Aero Tech Extension program and LCCC. That, too, can be organized to provide air-frame/electronics and associated kinds of training.

Present LCCC specialized career programs offered are: 235

- Agri-Business Technology
- Agriculture Mechanization Technology
- Agriculture Production Technology
- Apprenticeship Programs
- Associate Degree Nursing
- Auto Body Repair
- Auto Mechanics
- Bank Teller Training
- Bookkeeper
- Building Trades
- Chemical Technology
- Clerk Typist
- Communications
- Computer Science
- Construction Management
- Corrections
- Cooperative Education
- Data Entry
- Diesel Mechanics
- Early Childhood Development
- Engineering Technology
- Environmental Health Technology
- File Clerk
- Fire Science
- Food Services
- Heavy Equipment (Maintenance and Repair)

MX Impact Review Agencies
November 16, 1983
Page Three

- Heavy Equipment Operator
- Horse Management
- Host/Hostess/Cashier
- Law Enforcement
- Legal Secretary
- Licensed Practical Nurse
- Medical Radiography (X-Ray)
- Medical Secretary
- Mid-Management
- Office Occupations
- Safety Education
- Secretary
- Waiter/Waitress
- Welding - Gas, Arc, Heliarc

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cf

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Oct 20, 1983
FEIS/DRAFT

430

Boom or Bust.

The Environmental Planning Technical Report and the draft Environmental Impact Statement does not adequately address the Bust cycle after the completion of the project. Studies done in the sixties have seen great workforces move away from after the modification, many businesses failed and the economy declined. I believe that the Bust effect should be looked at on greater depth.

Phil Rosenlund
University Extension Agent
Laramie County
1400 Snyder Cheyenne
Wy 82001

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QUARTERLY NARRATIVE REPORT
April - June 1983

Philip A. Rosenlund
University Extension Agent
Laramie County
Ag, CD and County Director

CD

MX System

I have been serving on two committees concerning MX impact to Laramie County and Cheyenne. At this point, we are analyzing the environmental impact statement of URS Berger. They were hired by the Air Force to develop the EIS. From reviewing the EIS and from our own evaluation of the MX impact, we have developed the following concerns:

266 Transients - people migrating to Cheyenne in search of employment. This could create a major potential impact in the area. The actual number of new jobs are only about 100, but the lure of new jobs could attract several thousand people seeking those jobs.

725 Alcoholism - Drinking is a way of life here. There are serious concerns about substance abuse.

451 State Funding - A great deal of funding from the state is generated by mineral royalty receipts. Because these monies are down, social program funding may be down at a time when it is needed most. Also, mineral monies are earmarked for capital expenditures.

Leadership - There is little concern amon community leaders and the media about MX impact.

Tax base - MX will not offer an increased tax base as a coal mine would for example.

EIS - The draft EIS is being commented on now and the final EIS is due out in October. URS Berger will respond to questions about the draft EIS.

Industrial Siting - ISA guidelines are to be followed in principle, although some issues will be elirinated pursuant to the agreement with the Wyoming and Nebraska governors.

99 Mitigation Measures - Will innovative mitigation measures be prepared?

Civic Leadership - Leaders don't want to deal with or think about social problems or impacts. It is felt the community is apathetic and there is a great deal of resistance to change.

283 Economics - Local people are concerned about whether an MX boom will have negative economic effects on their personal lives. A concern was raised about local employment; during the last

283 Minute Man update, most of the employment was not from the local labor pool, but from outside the community.

1113 Agriculture - The EIS statement that agriculture is not as dynamic as it once was is incorrect. Fewer people are actively involved in agriculture, but the size of operation and specialization has certainly increased.

With these concerns expressed to URS Berger and community leaders, we will need to continue to point out concerns we have with the present Environmental Impact Statement.

175

LARAMIE COUNTY HEALTH PLANNING COMMITTEE

2521 EVANS AVENUE, ROOM 114
CHEYENNE, WYOMING, 82001
(307) 638-4188

November 18, 1983

The Honorable Ed Herschler
Governor of Wyoming
c/o State Planning Coordinator
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Dear Governor Herschler:

Enclosed are the combined comments of the Laramie County Health Planning Committee and the Health Facilities and Services Subcommittee of Mayor Erickson's IMPACT Committee on the Draft Environmental Impact Statement for Peacekeeper in Minuteman Silos.

Sincerely yours,

Jane L. Dorn
Planning Coordinator, LCHPC
Chairman, Health Facilities
& Services Subcommittee

JLD/eb

Encl.: 1

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
PEACEKEEPER IN MINUTEMAN SILOS

November 18, 1983

COMMENTS BY: Health Care Facilities and Services Subcommittee, IMPACT Team

GENERAL COMMENTS ON DEIS

Population Projections

DEIS, p. 3-15, Table 3.1.1-7, "Inmigration Estimates and Baseline-Total Population by County"

In this table, the Air Force presents the projects of Laramie County population through 1991 under both baseline and project conditions. The baseline projections differ significantly from those produced by the State of Wyoming ("Wyoming Population and Employment Forecast Report, 6th Edition," Dept. Admin. & Fiscal Control, July, 1983). The two projections are compared below.

* * * * * * *

Comparison of Baseline Population Projections
DEIS and State of Wyoming

Source	1983	1984	1985	1986	1987	1988	1989	1990	1991
DEIS	73,394	74,960	76,556	78,147	79,735	81,321	82,901	84,483	86,069
State WY	70,457	71,248	72,911	74,246	75,859	77,437	79,157	80,777	82,545
Difference	2,927	3,712	3,645	3,901	3,876	3,884	3,744	3,706	3,514

* * * * * * *

220 Although the general method of developing the DEIS projections is explained in the WNSIS, the Air Force does not explain its rationale for ignoring State projects or the reasons why the two sets of figures differ by 2,900-3,900.

In terms of health care services, the higher Air Force projections generally make the project impacts appear less significant than if the State's figures are used. The use of the higher 1983 population reduces the need for health

220 professionals to accomodate the impacts when professional to population ratios are used to calculate need (i.e., if in baseline year 1985, the ratio is so many professionals per 73,394 rather than per 70,467, the projected future need for professional staff under the proposed action alternative will be smaller and the Air Force is responsible for less mitigation). Overall, the use of the higher Air Force projections in the DEIS tends to lessen estimates of impact, since the inmigrant population from the project appears as a smaller percentage of the total population.

The reasons for the selection of the Air Force projections and the difference between these and the State's projections should be addressed in the EIS.

Transient Population

221 A significant concern of the health care community that is not adequately addressed in the DEIS is the potential of the Peacekeeper project to attract many unemployed and/or transient persons, including entire families into Cheyenne. The problem is acknowledged, but the potential magnitude of the problem has been seriously underestimated. Cheyenne, located at the crossroads of major east-west and north-south transportation routes, already has a significant transient problem that affects many health and human services. Further, data from COMEA Shelter and the Salvation Army show the problem is growing. The State Job Service and the Laramie County Department of Public Assistance and Social Service, based on years of experience in dealing with the problem, estimate that the Peacekeeper project could attract as many as ten applicants for every available job--five who are sincerely applying for the job, and five more who are "riding the system."

Both the Laramie County Department of Public Assistance and Social Service and the City-County Health Unit have already had to assist individuals and families who claim they came to Cheyenne because of the possibility of employment on the Peacekeeper project. If these people are already coming to Cheyenne, how many more will come as actual hiring and work start?

552 The transient and unemployed may be significant users of health care services. They often lack adequate food, clothing, and shelter, and appear more susceptible to illness. Because they have little money, they often postpone seeking health care until they are very ill. These patients usually seek help at the City-County Health Unit or hospital emergency rooms, particularly the county hospital. They may also seek help from Southeast Wyoming Mental Health Center, particularly the Center's various alcohol treatment programs.

In nearly all instances, the cost of caring for these transient or unemployed patients is born by state, county, or city funded programs or simply written off by the care providers as charity or bad debt.

The DEIS should address the impacts of the transient and unemployed population on both human services and health services.

The problem of planning for transients is admittedly one of not being able to predict numbers. To my knowledge, there are no good methodologies for forecasting transient numbers. Local experience is probably the best basis for any estimations. The Air Force appears to have attempted forecasting the transient population that will use COMEA Shelter during the project by assuming that transient numbers are directly related to the size of the resident adult population in Laramie County (e.g., one transient per so many residents), p. 3-64, Draft EPTR, Public Services and Facilities. There is absolutely no basis for such a projection method. The number of transients coming to a community will vary significantly, depending at least upon the local, regional, and national employment rates, the number and kind of jobs perceived as available in the community, transportation routes and services, geographic location, climate, time of year, and undoubtedly many other factors.

553 Since there are no good techniques for predicting the number of transients, and a large transient population may be an unavoidable consequence of the Peacekeeper project, mitigation measures should include a monitoring program that allows immediate identification of unmet needs associated with transient problems and modification of mitigation measures to meet these unmet needs.

COMMENTS ON HEALTH CARE ASPECTS OF DEIS

Hospitals

DEIS, p. 3-107, para. 6

541 The DEIS correctly points out that Memorial Hospital of Laramie County may have to expand the obstetrics unit of the hospital to accomodate an increased birth rate during the project. While this would generally only represent an acceleration in the growth of this service, this still should be addressed in the DEIS. Any acceleration in a building or development program represents lost opportunity costs. That is, if the hospital did not have to expand the obstetrics program earlier than planned, what other services might instead have been developed or expanded?

222 Also, if the hospital is to rationally plan for an early expansion of obstetric services, it will need better demographic data on the inmigrant population than is now available in the DEIS. Ages of workers? Number with families?

Emergency Medical Services

DEIS, p. 3-108, para. 1

542 The DEIS correctly points out that existing emergency medical services are generally adequate to accommodate the increased service levels of the proposed action. One possible problem area is the handling of accidents at remote construction sites such as launch facilities. The Draft EPTR, Public Services and Facilities, p. 3-111, suggests the provision of emergency medical transfer

542 capabilities at the staging areas." This mitigation measure should be expanded to include the requirement that one or more persons with basic emergency care training be available at each staging area and other construction activities.

City-County Health Unit

DEIS, p. 3-108, para. 2

The DEIS states that "Additional staffing under the No-Action Alternative should accomodate the service demand increase due to the Proposed Action. Some additional short-term workload can be anticipated, but not enough to warrant additional staffing for project-related immigrants."

The above quoted conclusion is not supported by the Air Force's own analysis or the present circumstances of the Nursing Services at the Health Unit. In identifying impacts and needed mitigation actions for the Nursing Services, the following information should be considered:

1. The City-County Health Unit is already operating at capacity, and any additional population will further stress service provisions.

2. In the Nursing Unit, there is a current need for at least one additional public health nurse and the Environmental Health Division needs a field sanitarian.

543 3. State funds for an additional public health nurse will probably not be available, and the County will have to pay for an additional nurse if one is provided.

4. The current professional and paraprofessional staffing of the Nursing Service is as follows (the data on p. 3-113 of the WHSIS are incorrect):

   Health Officer - M.D., full-time (also oversees Envir. Health Div.)
   Dir. of Nursing - full-time
   Nursing Supervisor - full-time
   Nurse Practitioners - 4.5 FTE
   Public Health Nursing - 10 FTE
   WIC Nurse - 1 FTE
   Family Planning Nurse - 0.5 FTE
   Afternoon Clinic Nurse - 0.5 FTE
   Nutritionist - 1 FTE
   Home Health Aides - 2 FTE
   Clinic Aides - 2 FTE

A physical therapist also works half-time on contract and other professional services area contracted for as needed. In 1983, the Nursing Services employed 23.5 professional and paraprofessional staff (excluding the Health Officer who works at least half-time for Nursing Services and is involved in direct patient care) just to meet current needs. If the additional, needed, public health nurse position is added to the total, a baseline standard of 24.5 professional and paraprofessional positions in Nursing Services is established. This is the standard against which future needs should be measured.

Staff to population ratios are an imperfect method of projecting needs, but the ratios are useful as indicators. Using the Air Force's own projections of baseline and proposed action populations in the following table, one can clearly see that the proposed action will place a burden on the Nursing Services which cannot be dealt with just by the additional staff needed under baseline conditions.

543 PROJECTIONS OF NURSING SERVICE PROFESSIONAL STAFF

	1983	1984	1985	1986	1987	1988	1989
Baseline Population	73,394	74,960	76,556	78,147	79,735	81,321	82,901
Staff	24.5	25.0	25.5	26.0	26.6	27.2	27.7
Proposed Action Pop.	73,394	74,960	79,290	81,726	85,629	85,405	87,756
Staff	24.5	25.0	26.5	27.3	27.9	27.8	28.3
Minimum Additional Staff Needed Due to Project	0	0	1.0	1.3	1.3	0.6	0.6

As the above calculations show, during the period between 1985 - 1988, project-related population will create a need for at least 1.0 additional professional or paraprofessional persons in Nursing Services and after 1989 a permanent need for at least 0.5 FTE in Nursing Services.

Further, the Air Force, in both the WNSIS, Vol. 1, p. 3-317 - 3-318, and the Draft EPTR, Public Services and Facilities, p. 3-50 - 3-51 point out the following facts:

- "Laramie County has a young population and a high birth rate. The projected population will continue this trend. With the high birth rate comes increasing demands on the public health department; i.e. increased numbers of pregnancy tests, demand for prenatal classes, higher incidence of teenage pregnancy, more visits associated with immunizations, well child clinics, etc."
- "Even if the incoming population has a high employment level, in many instances incoming population, or transient population will use Public Health Department services rather than establishing relationships with private physicians."
- "There has been an increase in venereal disease cases [includes all sexually transmitted diseases] in Laramie County. Public health officials are concerned that as population levels increase, so will the incidence of venereal disease."
- Starting in fall 1983, school nurses at County School District No. 1 will no longer be taking throat cultures. City-County Unit will experience high rates of throat culture visits as a consequence, further impacting the stressed facility."

543

Thus, the level of staffing needed under the Proposed Action Alternative may actually be higher than baseline projections would indicate.

For all of the reasons cited, the estimation of project impacts on the Nursing Services of the City-County Health Unit should be revised to state:

> Additional staffing under the No Action Alternative will not be adequate to accommodate the service demand increases due to the Proposed Action. Significant additional workload can be anticipated, particularly during the peak construction activity years of 1985 to 1988. During this period, at least one additional professional/paraprofessional staff person will be needed to accommodate the increased service demand. After 1988, at least 0.5 FTE professional/paraprofessional staff position will be needed to accommodate the increased service demand. Since the population, including transient population, may use more public health services per capita than existing or no-action population, additional staffing related to proposed-action population needs may be somewhat higher than the minimums stated above. An appropriate monitoring and response mechanism should be part of the mitigation process for dealing with impacts on the Health Unit.

543 Overall, impacts on the City-County Health Unit should be rated high and significant in the short term.

The proposal to establish a free-standing health clinic for the duration of construction activities that is coordinated with the City-County Unit, but independent (p. 3-321 WNSIS, Vol. 1), does not make good economic or health sense. The Unit does not presently have space for any additional staff or services, but various options are being explored. The Air Force could better spend its money by assisting with this process rather than setting up a separate facility. Further, a separate facility raises many other

544 questions. Who would be eligible for services, only those somehow identified as associated with the Project? If only project-associated population could use this clinic this would tend to work against the integration of this population into the community. Could a small unit afford to offer the range of programs and services now provided by the Health Unit? If it could not, wouldn't many clients (if allowed to do so) still go to the City-County Unit? If the nursing staff were independent of the Unit, as proposed, service duplications and service gaps would likely occur.

Mitigation Measures

DEIS, p. 3-123, para. 2

Comments on the specific health care mitigation measures are as follows:

Proposed Mitigation:	"Provision for a clinic to provide preventive medicine services for workers and their families (Laramie County Public Health Department). Provision of immunization clinics as facilities to take throat cultures and to test for other illnesses to alleviate the strain on the public health units (Laramie County Public Health Department);"
Comments:	See previous comments on creation of a separate clinic for project related population. This is not an acceptable solution. Public health services should be maintained within the framework of the Health Unit. Creation of special health programs just for workers and families also discourages them from using local private health care which generally has the capacity to serve the additional population.
Proposed Mitigation:	"Provision of emergency medical transfer capabilities at the staging areas (project contractor),"
Comments:	See previous comments on emergency medical services.

Proposed Mitigation	"Provision of health insurance to employees (project contractors),"
Comments	This is an acceptable mitigation measure provided contractors can be required to provide this employee benefit. Can this be enforced by the Air Force?
Proposed Mitigation:	"Ongoing coordination with the Laramie County Health Planning Committee and other appropriate agencies to ensure that the proper level of planning can be achieved prior to impact conditions (U.S. Air Force and Laramie County Health Planning Committee)."
Comments:	The Laramie County Health Planning Committee has already voluntarily devoted a very significant amount of time to planning for the Peacekeeper project. Since the agency has only one professional staff person, this has meant the agency has been forced to delay other planning activities. The agency is privately supported, does not represent all health entities in the community, and with the current limited staff and budget, can only do a modest amount of coordination and planning. (Note: Table 5.1 5-1 on p. 5-7 of the EPTR, Public Services and Facilities, lists the Wyoming Health Systems Agency as part of the health care delivery system in the ROI. This agency was permanently closed in October 1982 and should not be considered a planning resource.)

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LARAMIE COUNTY LIBRARY SYSTEM
2800 CENTRAL AVENUE
CHEYENNE, WYOMING - 82001 - (307) 634-3561

TO: Board of County Commissioners

FROM: County Librarian

RE: Comment on MX Impact Study of September 1983

The September 1983 study examines the impact of the Peacekeeper project upon Laramie County Library System in considerable depth and is for the most part accurate and acceptable. However, several problems do exist.

799 The first problem is that the study projects only the impact caused by more population. Impact due to the changing nature of the population is discussed briefly in the narrative but is not addressed in the quantified impact section. Libraries experience far higher loss rates and must expend far greater amounts of staff times in providing services to short term residents due to the fact that return rate and many staff time expenditures are related to the stability of the borrower's address. Based on mineral impact experienced by other Wyoming libraries, the impact due to the changing nature of the population is likely to exceed the impact attributable to increased population.

801 The second problem is that the suggested mitigative measures are in effect not mitigative. The state-wide automated interlibrary loan and circulation is already on priority implementation. Laramie County Library System's and School District One's library services are already fairly well coordinated. The duplication that remains is essentially irreductible. The other suggestions have been tried in mineral impact communities. Generally, the result has been administrative and staff costs that exceed the benefits derived.

798 Finally, I would like to point out that even the impact attributable to raw population increase (table 3.1 w-7 page 3-34) carry significant costs. The addition of two staff members and 6,600 books at the 1987 peak are major expenditures far beyond the ability of Laramie County Library System to absorb.

October 11, 1983

Table 3.1.4-7

LIBRARY BOOK AND STAFF NEEDS WITH PROJECT LARAMIE COUNTY PUBLIC LIBRARY SYSTEM

		1985	1986	1987	1988	1989	1990	1991	1992
Recommended Book Provision to Immigrants[1] Based on:	Existing Ratio	4,700	6,000	6,600	3,400	3,100	1,700	1,700	1,700
	WSI Standard	5,500	7,700	7,800	4,000	3,700	2,000	2,000	2,000
Recommended Staff Provision to Immigrants[1] Based on:	Existing Ratio	1.3	1.7	1.9	1.0	0.9	0.5	0.5	0.5
	WSI Standard	1.4	1.8	1.9	1.0	0.9	0.5	0.5	0.5

Note: 1 Projections based on existing ratios use 1.69 books per capita and 1 FTE staff per 2,083 population. WSI standards were used in the second set of projections for comparison: 2 books per capita and 1 FTE per 2,000 population. Numbers of books for both projections were rounded to the nearest 100

Source: Table 2.3.3-3 and Appendix A-2.

3-34

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WALTER COCKLEY, M.D., Director — TELEPHONE 6324-63

City-County Health Unit

315 WEST 20th STREET
CHEYENNE, WYOMING 82001

November 9, 1983

AFRCE-BMS/ DEV
Norton Air Force Base, California 92409

Dear Sirs: Refer to Public Hearing Nov. 2, 1983

595 Human Service Mitigation (p. 3-307) the measures offered are nonspecific to agencies and problems, therefore they lack meaning and/or usefulness.

Monotoring program is recommended, however, the statement is vague, relative to fiscal responsibility and communities capability and competence to respond to identified needs.

The statement should be clear in its philosophical objectives, method and fiscal responsibility.

The method should identify strategies to amend and respond to:

1. demographical types, changes and numbers
2. types of problems
3. staffing adequacy
4. program capabilities and responsiveness relative to problems.
5. development of Human Service Council and/or association with communities participation and input.
6. Training and technical assistance to administrators
7. staff education/and development to meet impact generated changes.
8. identify communities fiscal capability and alternate funding resources for monotoring and mitigation effort.

Respectfully submitted,

Maija D. Farenhorst R.N., M.P.H.

Maija D. Farenhorst, R.N., M.P.H.
Nursing Director
Laramie County-Cheyenne City Health Unit

MDF/cmg

178

MEMORANDUM

TO: Ellen Crowley, Chairman, Coping Mechanisms Sub-Committee on the MX Impact
FROM: Maija D. Farenhorst, R.N., Nursing Director City County Health Unit
RE: Department of the Air Force Socioeconomic Impact Study, Volume 1.
DATE: October 4, 1983

3.10.1.3 Public Health Department
p. 3-311 Women, Infants and Children Supplementa. food program.

700 Following "five Nurse Practicioners" add e.even R.N. , generalized Public Health Nursing.

p. 3-314 "The County will have no provide any additional nurses (Cohen 1983)." Change to "Laramie County and Cheyenne City has no funds for additional nurses for F.Y 1983-84".

3-321-24 Mitigation Measures
p. 3-321 Comment: The City County Health Unit is in centra. location. "The clinic would be coord.nated through the City-County Health Unit: however, the nursing staff would be independent of the Health Unit." The last statement makes accountability questionable, for if the satellite clinic nurses will be independent of Health Unit they also will not be accountable to Health Unit Health Officer and Board of Health and they might choose not to participate in coordination of services. Furthermore, the construction activity will be followed by a "Bust." Therefore, planning must be done to anticipate and monitore the staffing for increased service demands for the Bust, and thus the whole cycle. The agency must have the capability to respond and adjust with adequate staffing to service demands qualitatively and quantitatively. It is essential that the community needs and services be monitored in terms of what is now, what becomes, and the communities capability to prevent impact generated problems.

699

704

MDF:cc

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County Clerk and Register of Deeds 179

Laramie County

Laramie County Courthouse

P O. Box 608 • Phone 307/636-4288
Cheyenne, Wyoming 82001

JANET C. WHITEHEAD
County Clerk and Ex-Officio Register of Deeds

November 21, 1983

AFRC-BMS/DEV
Norton AFB, CA 92409

Comments on the Draft Environmental Impact Statement for Peacekeeper in Minuteman Silos, Public Finance Section.

The following comments pertain to the public finance section of the DEIS as it relates to Laramie County, Wyoming.

Projected Laramie County Revenues no action and proposed action alternatives (Tables 2.1.3-3 and 3.1.3-5).

399 1. Carryover revenue - we can find no basis for including these amounts in the financial projections. This must be a new revenue source as it is not included in 1982 actual numbers. We are unable to find any explanation of what these amounts include either in the Draft Environmental Impact Statement (DEIS) or in the Draft Environmental Technical Planning Reports. Our definition of carryover is "the application of fund balance to current operations". If this is the case, the amounts per the projections should be variable amounts and not constant as you have projected. In summary these amounts should be defined, reviewed and eliminated or revised to be variable based on results of operations of the previous year.

400 2. Interest income - due to changes in state law regarding the more frequent distribution of agency funds to recipient governments, the County will be and is experiencing a major reduction in interest income in fiscal year 1984. Our current projections indicate a reduction of over $300,000 in 1984 and then remain relatively constant in the remaining projection years.

401 3. Impact assistance - the proposed action alternative provides no indication of any federal funds to help mitigate the financial impact on the County. We conclude from this that the state and local governments are going to have to provide any additional revenues to finance the impact caused by this project.

Proposed Laramie County Expenditures proposed action alternatives (Table 3.1.3-6).

402 1. Expected increases in costs as the result of the occupation of the new jail facility do not appear to be considered in the expenditure projections, either no action or proposed action alternatives

Laramie County — The County with the Cheyenne Area in the Center

403 2. Impact assistance - this line item needs to be defined and reviewed. We have no way of evaluating the validity of these amounts due to lack of explanations. We have to assume that we are going to have to provide assistance during the impact period to other governments or organizations.

404 Laramie County Baseline Future - No action (par. 3.1.3.4.1.1). It should be noted that any revenues over expenditure imbalances must be funded by unreserved-undesignated fund balance. A continued situation of expenditures exceeding revenues would result in cuts in services. Laramie County is required by law to have a balanced budget. Unlike the federal government we are not allowed to spend in excess of total available resources.

Laramie County Baseline Future - Proposed Action (par. 3.1.3.4.12).

405 1. As stated above the imbalance in revenue and expenditures will have to be funded to the extent of unreserved-undesignated fund balance. After fund balance is exhausted the imbalance will create a reduction of services. Spending in excess of available resources is not an alternative for Laramie County.

406 2. It should be noted that Laramie County has no additional taxing capability as we are currently taxing to our maximum as allowed by state statutes. Any increase in taxes to finance the impact of this project would also place the citizens of Laramie County in the position of paying more than their fair share for the development of this system.

407 3. The comment of having to delay the construction and planning for the City-County jail facility is out of the question due to recent decisions in federal court requiring various governments in Colorado to upgrade their facilities to federal standards. Any delay in the City-County jail facility could possibly result in this type of order being imposed on Laramie County, which could significantly increase the cost involved.

Mitigation Measures, Laramie County, Wyoming (par. 3.1.3.6.1-2).

408 1. Increasing license and fees - many fee limits are set by state statutes and because these fees, overall, represent a small portion of the budget, the effect of this measure would be minimal.

409 2. Purchases of materials by contractors would affect the revenue picture little unless those purchases were made through local suppliers.

410 3. Expenditure reductions are considered annually and could have some merit. However, significant budget cuts would result in reduction of services. This again implies that the citizens of Laramie County would be making sacrifices in quality of government thus paying more than their fair share for the system development.

411 Significant improvements and maintenance impacts are noted in paragraph 3.1.9.4.1.2 proposed action on rural area roads. Table 3.1.9-3 suggests 510 miles of gravel roads which will require surface improvements along with various bridges, culverts and other improvements. Paragraph 3.1.9.6 Mitigation measures place responsibility for these required road improvements and maintenance on the local governments. This fact has not, however, been addressed in the public finance section projections.

411 The area of financial responsibility for this portion of the project need to be defined in more detail and cost estimates included in the public finance section of the DEIS. The inclusion of these estimates will significantly affect the public finance section which may change the conclusion about the impact on public finance.

In conclusion it is our opinion that the DEIS public finance section needs to be reviewed and amended to include adequate explanations of questioned items. Amendments need to be made to show the financial impact on the County of requirements of road improvements and maintenance required during the project. Mitigation measures need to reviewed and impractical items deleted.

Janet C. Whitehead
Laramie County Clerk

Robert W. Cook
Laramie County Clerk
Fiscal Officer

180

Platte County
School District Number One

[redacted]

October 5, 1983

Ronald A. Torgerson, Major, USAF
Deputy Director, Environmental Planning Division
Norton Air Force Base, California 92409

Dear Major Torgerson:

1 I have reviewed Volume I of the Wyoming and Nebraska Socioeconomic Impact Study. My review was directed on the information found on pages 4-43 through 4-52, Platte County School District No. 1. The data on the district was accurate enough for the purpose of your study. Under the conditions you outlined concerning possible impact, I have no arguments with your projections.

The bottom line is that I have no additional comments at this time.

Sincerely,

Edward W. Hunter
Superintendent of Schools

181

Scotts Bluff Co./Twin City Civil Defense

COUNTY ADMINISTRATION BUILDING GERING, NE. 69341
PHONE (308) 436-7844 SHERRY BLAHA, DIRECTOR

November 28, 1983

AFRCE-BMS/DEV
Norton AFB, CA. 92409

Dear Sir:

Enclosed please find a letter written to Col. Warren Hickman in Cheyenne, Wyoming.

This is my public comment of the public hearings that hive been held pertaining to the local meetings of the MX Missiles.

Sincerely,

Sherry Blaha
Civil Defense Coordinator

182

Scotts Bluff Co./Twin City Civil Defense

COUNTY ADMINISTRATION BUILDING GERING, NE. 69341
PHONE (308) 436-7844 SHERRY BLAHA, DIRECTOR

November 28, 1983

Col. Warren Hickman
Peacekeeper SATAF
FE Warren AFB
Cheyenne, Wy. 82005

Dear Col. Hickman:

I have attended a couple of the hearings pertaining to the Environmental Impact of the MX Missles.

I can appreciate all the work and funds that have gone into the preparation of this document. I also understand that the effects of war are speculative and are not addressed in this document.

As Civil Defense Director of this County, my main concern is for the protection and safety of the citizens in this area which is considered to be a "hot spot" in the event of a nuclear war or accident.

110 Compared to Russia, we in the United States are extremely far behind in our Civil Preparedness. We are in great need of protected shelters, supplies to stock them, and education for the people on what to do in the event of a nuclear crisis.

I have not seen this subject addressed in any of these hearings. It may not be a subject of concern for the Air Force; however, I would appreciate this subject being addressed somewhere along the line.

Sincerely and Respectfully,

Sherry Blaha
Civil Defense Coordinator

cc: THE PRESIDENT
AFRCE-BMS DEV
Rep. Virginia Smith
Senator Bill Nichol
Local Gov't. representatives

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-329

183

The City of Cheyenne, Wyoming 82001

MAYOR

CITY COUNCIL

Major [illegible]
Director, Environmental Planning Division
Department of Air Force, AFRCE-BMS
Warren Air Force Base, [illegible]

Jon Jorgenson
Mayor of Cheyenne, Wyoming

[illegible] comments on the DEIS

2 Attached are comments on the DEIS from various subcommittees of the Mayor's Task Force. It is hoped you will find these comments useful in your preparation of the final Environmental Impact Statement. You are more than welcome to contact my office or the Planning Office if you have questions or would like further information on

[illegible]

CHEYENNE FRONTIER DAYS

184

MEMO

TO: Gayle Malmquist

FROM: John McLellan - Mayor of Gering

DATE: October 12, 1983

RE: Comments on Wyoming-Nebraska Socioeconomic Study

1090 1. The study dealt with impacts primarily in the Cheyenne area. Little attention was paid to the transportation and highway network. The movement of the missile and its weight on both the dirt surfaced roads and paved highways in the area are of specific concern.

83 2. The lack of opportunity for the City of Gering to provide input to the Air Force and the Peacekeeper Working Group throughout the process is also a concern. One presentation, made by Major Torgerson, to a joint meeting of local service clubs and response to the consultant's inquiries have been the city's only means of communicating our concerns.

This information was provided via telephone to the Policy Research Office by Mayor McLellan.

185

CITY OF KIMBALL
223 South Chestnut Street
Kimball, Nebraska 69145

October 27, 1983

James F. Boatright
Deputy Assistant Secretary of the Air Force
Norton AFB, California 92409

Dear Secretary Boatright:

The draft environmental impact statement for Peacekeeper in Minuteman Silos released by the Department of the Air Force in October, 1983 is thorough, complete and beautifully done. It explores every area for the impact of flora, fauna, air, water, soil, noise, geologic, palentologic, transportation, emerg, recreation, utilities, housing and social well being.

The consensus of the draft statement is that the placement of the MX in minuteman silos offers negligible impact within most areas in both the short and long term.

However, the population projection for both the city of Kimball and the Kimball schools seems out of line. Kimball has been a very unique city because of a tremendous fluctuation of population in the last twenty-five years due to the oil industry. The placement of minuteman missile surrounding the city came at a time of peak oil activity which doubled our population in a short span of time.

229 The volatile oil business, which is depressed at the moment, can escalate our population rapidly; way beyond the proposed figures in the study, even without missile projections. We have gone up and down numerous times, though we never expect to attain the large population generated the the late 60's and early 70's.

I think the figures are very unrealistic concerning the number of people who will reside in Kimball with the MX deployment. 526 Estimating a decrease instead of an increase for the high school when projecting some families moving to Kimball seems unlikely.

The impact on the city of Kimball should be more of an economic gain than a threat. Since we have taken care of twice the population we now have, our facilities for the city, schools, hospital etc. stand ready for an influx of any amount of people.

194 I do, however, resent the statement that "the impact on the nine families living within the quantity distance zone are judged to be low and insignificant because resources are adequate to deal with the change and the impact will not be county wide. The dislocation problems will be settled during the construction so that residents will become adjusted to the situation."

194 The great impact was many years ago when land was purchased and the minuteman silos were placed much too close to many farm sites. Yes, the families have adjusted, and they will adjust again. But it will forever be voiced and believed that they gave up their farms to the government.

Kimball city and county residents have not fought the placement of the MX missiles in minuteman silos because they believe in a strong defense and also because the vulnerability does not seem much greater with the emplacement of the larger missile. They also believe they will be expendable if there were every a need to fire the missiles.

186 I have voiced two options to the military that I think should be considered. Since there are so many minute man sites in this area, why must these nine sites be used? If that is not feasible, why not 91 missile placements? Why must the magic number be 100?

The largest impact, in my opinion, is the inestimable amount of money and time that has been spent by the US government, military, States of Nebraska and Wyoming, cities of Kimball and Cheyenne and all the citizenry in collecting, preparing and analysing the Draft Environmental Impact Statement which will probably be shelved for a time, then forgotten.

Sincerely,

Edith Haines
Mayor, City of Kimball

James F. Boatright, Deputy Asst. Secy of the Air Force
Honorable Virginia Smith, US House of Representatives
Honorable Robert Kerry, Governor, State of Nebraska

186

TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-452

187

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-313

188

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-365

189

VILLAGE OF DIX

Dix, Nebraska 69133

November 17, 1983

Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, NE 68509-4601

Sirs:

After reviewing the Draft Environmental Impact Statement - MX Missiles - Nebraska Review, the members of the Village of Dix Board of Trustees feel that there will be an impact of the peacekeeper missiles on the roads near Dix in Kimball County.

We are particularly concerned about the 3 miles North of the Village of Dix to join the 2 miles of CF-3 road and then 4 miles North to F-1. And also, the road from the Village of Dix South to K-1. We are of the opinion, that for the safety of the men, both of the roads should be hard surfaced. 1010

Also, with the better hard surfacing, the fire department can better take care of serving the Air Force sites and vehicles.

We strongly feel that there will be contractors, etc. looking at Dix for housing and equipment storage, thus this will be a financial burden to the Village of Dix. 437

Sincerely,

Jerry D. Lane, Chairman
Village of Dix Board of Trustees

JDL/rrw

cc: Louis Lasberty
Jim Jensen
Robert Clark
Edward Zorinsky
Kimball County Commissioners
Virginia Smith
James J. Exon

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NOV 21 1983
POLICY RESEARCH

190

CHEYENNE AIRPORT

P O BOX 2083 · AIRPORT STATION · CHEYENNE WYOMING 82003

November 16, 1983

Maj. Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFRCE - BMS
Norton AFB, CA 92409

RE: Airport Management Comments on Draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos

Dear Maj. Walsh:

The Airport has reviewed the Draft Environmental Impact Study (DEIS), with particular attention paid to the aviation section of the study. I have enclosed with this letter comments on that review.

I would point out that the Cheyenne Airport Board is currently in the process of selecting a consultant to update our existing Airport Master Plan and perform an FAA FAR Part 150 Noise Study. The scope of work includes review of Peacekeeper project impacts on the Airport. This study is planned for completion in December of 1984.

We would like to keep the communication channels open with you so that if our study reveals an impact not now anticipated we can still talk with you about possible solutions.

We look forward to continuing to work with you throughout the project so that the Cheyenne Airport can provide the maximum amount of service possible to the USAF and the community.

Sincerely,

John Wood
Airport Manager

JW:cb

Encl.

cc: Airport Board

THE HOME OF FRONTIER DAYS

Airport Manager's Comments

The "Aviation" sections of the Draft Environmental Impact Statement of the Peacekeeper Missile System based much of its information and background data on the Airport's 1978 Airport Master Plan.

This Master Plan is considered inadequate and unrealistic in that it contains views and data of what community leaders at the time would like to have seen in airport growth, and not what was realistically going to happen.

1013 The Airport Board is currently in the process of selecting a consultant to produce a new Airport Master Plan during calendar year 1984. It is felt that the findings of this study will correct inaccurate information and forecasts contained in the current Master Plan and thus be of greater use to the community and the U.S. Air Force in evaluating Airport impact.

As for the balance of the impact study, aviation sections, there are four areas which need to be addressed further:

1. It cannot be overemphasized that the existing condition of airport runway and taxiway pavements is, in many cases, marginal, and in some cases terrible. The increased aircraft activity anticipated by the Peacekeeper project will accelerate and worsen this deteriorating pavement condition. Whether this impact should be mitigated with U.S. Air Force funds or through a speedup of FAA grant monies to coincide with missile impact time frames, is a matter for discussion. Something must be done soon to keep these pavements from posing a safety hazard to aircraft. 1014

2. The size, location and accessibility of automobile parking in the terminal area is very limited. The Airport is currently approaching capacity of existing space and would, as a normal course of events, be seeking additional space within two years. The missile project will accelerate the need for additional space and cause an even greater increase in demand. 1015

3. While the body of the report referred to a seating capacity and passenger space problem within the terminal building, it did not address any measures to correct the situation. The terminal building is critically short of space for passenger seating. While there are three aircraft parking slots, there is only one passenger access gate to the ramp. Enclosing the passenger concourse would not only provide additional seating capacity for arriving and departing passengers and guests, but would also provide passenger gate separation and better airline security screening activity. It would also allow the correction of another problem, that being the inadequate size of the baggage area of the terminal. The non-standard design 1016

1016 of the building contributes to these problems. But there is no way the building can handle the projected passenger enplanements envisioned in the report in the latter part of this decade with any reasonable efficiency or comfort to the passenger.

4. The noise portion of the DEIS suggested five possible approaches to mitigating noise impact at the Airport. Two of the items are, at this time, not considered to be viable alternatives:

1477 1) The implementation of air traffic curfews would not only be contrary to current Airport philosophy and policy, but would be very difficult to enforce.

1478 2) The Cheyenne Airport is small (only 950 acres) and "land-locked." It would be impossible to relocate aircraft startup, testing and taxiing areas so that they would not impact the adjacent area. There simply is nowhere to go.

It is acknowledged that most of the aviation impact will be indirect; i.e., increases in corporate aircraft activity by missile project contractors and an increase in air carrier passenger loads, etc. There will obviously be some direct impact from an increased number of government aircraft operations which USAF Transient Alert will have to handle.

Overall, it is felt that the general impact on the Airport will be somewhat larger than anticipated by the study. Most of this impact, however, should be private sector associated with the project and except for the specific problems outlined here, can probably be handled through normal airport operations.

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

191

MEMO

TO: Adra Rae Bliss

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

---

388 We have reviewed the Draft Environmental Impact Statement.

☑ No comment.

☐ Comments are attached.

RECEIVED
OCT 27 1983
POLICY RESEARCH

Name Arda Rae Bliss Title City Clerk-Treasurer

Office City of Bridgeport

Address Box 280 Bridgeport, NE 69336 Date November 1, 1983

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

The City of Cheyenne, Wyoming 82001

Capital Facilities Coordinator
2101 O'Neil Avenue

192

CITY COUNCIL
J. ROBERT SYDNEY
PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M. P. "MARY" GRIFFITH
WANDA MICUE
GEORGE "SCOTTY" REID
RONALD N. ROGERS

MEMORANDUM

TO: GARY L. GRUNKEMEYER
DIRECTOR OF PUBLIC WORKS/CITY ENGINEER

FROM: JOHN SANDAHL JS
CAPITAL FACILITIES COORDINATOR

DATE: NOVEMBER 4, 1983

RE: COMMENTS ON DEIS AND EPTRs

Here are my comments, as per your request.

JS/dn

cc: File

Comments On DEIS and EPTRs

I. General Comments

A. Simultaneous Construction

453 There is no discussion in this study of the impact on City, County, or Regional non-MX construction plans (both government and private) of the simultaneous construction of MX facilities. The prices of both labor and materials will escalate. Union wage contracts will increase at a greater than normal rate because nearly all union laborers and craftsmen will be employed, and the union administrations will ask for (and get) more. This happened recently in Laramie and Platte counties with the construction of the Laramie River Power Plant. Material prices will go up due to greater demand and perhaps even scarcity in some areas, especially concrete. Laramie County has experienced concrete shortages several times since 1970; each time costs went up 20-50%, if concrete could be obtained at all. If material cannot be obtained, delays are incurred in projects which also cause costs to rise. This "simultaneous construction" impact has not been recognized or dealt with at all in the WNSIS report. It potentially will be the greatest of all possible impacts to all new regional capital facilities.

B. Monitoring

88 The analyses presented in this report are all based on assumptions regarding the actual numbers of people and quantities of materials required for MX deployment. We are preparing for the impact of this deployment based on these assumptions. The ACTUAL deployment should be monitored by some method, with the mitigations that will be agreed on now to be modified by these future findings. Without this future monitoring of actual events, we are placing ourselves in the position of a vendor at a fruit market agreeing to accept 50¢ today for approximately 2 apples tomorrow - maybe the number will actually be 1 or 4. You can easily see how long this vendor would stay in business.

C. Mitigation Fund

Monitoring is probably the most essential activity that should be funded and accomplished. Besides the importance of watching what the Air Force actually does, we should also monitor the actual impacts to the community. The idea has been brought forward by others that a mitigation fund be established with money paid out as actual impacts occur or as advance planning and construction money is required.

This way one agency does not get overfunded while another is left out in the cold. If there is money left in the fund after the bust cycle, it could return to the Federal Government. This idea has merit in that we wouldn't have to bicker now (local vs feds) about how much mitigation
88 is appropriate. The administrators of this fund, which should be composed of representatives of all the governmental entities involved, would have to determine appropriateness on a case by case basis. This method also ensures continued impact monitoring. I feel strongly that this idea is the best mitigation solution put forward to date and that its implementation and funding by Congress should commence immediately.

D. Laramie County Road & Bridge Department

585 I agree that the Road & Bridge Department Shops should be relocated to a more suitable facility and location. We should encourage locating this facility with the City Public Works Complex, proposed for the College Drive and Fox Farm Road site.

E. City of Cheyenne Police Department

530 I would be more comfortable with a minimum space allocation of 18,000 square feet for the Police Department, rather than the 14,500 square feet quoted in this report.

F. Section 3.2.8.4 Fire Protection - Mitigative Measures

689 As stated in this WNSIS, there will be approximately 1,378 new homes in South Cheyenne in 1987, 720 more than with baseline growth. Many of these areas will be annexed and require fire protection. This will accelerate the need for a new South Cheyenne Fire Station, located further to the south than the present one. If this station has to be built in 2-3 years, rather than in 5-10 as is presently planned, a project impact will be the use of General Fund money (approximately $450,000.00 at an earlier time than would be anticipated without MX. This "Use Cost" should be addressed under mitigative measures, as well as the impact of simultaneous construction.

G. City of Cheyenne Fleet Maintenance

506 Due to the increase of vehicles and equipment mentioned in the proposed mitigations for the Police Department, Fire Department, Street and Alley Department (landfill equipment and Sanitation Department (solid waste collection vehicles), a highly significant adverse impact will be realized by the City Fleet Maintenance Division of the Public Works Department. More staff and space will be needed to maintain these vehicles.

506 The short term local impact will be high, significant and adverse. Long term this impact will be low, significant and adverse. During the "Bust" cycle the impact will be highly significant and adverse due to the reduced need for police and fire services.

H. Emergency Services

536 Laramie County Fire District #2 will be expected to provide emergency services at the silos and on the roads to and from the silos. They have only one emergency vehicle now for use in the district. If they have an emergency call in the district plus an accident on the sites or roads involving MX construction, they could only respond to one. I recommend that either the Air Force provide emergency services for the sites and roads, or that they provide Fire District #2 with another emergency vehicle. This vehicle would have to be funded immediately as Fire District #2 would have no way to raise the funds necessary for one.

II. Specific Comment

511 Page S-12 Public Services
Paragraphs 13 and 14 - If law enforcement has a moderate and significant level of impact - "significant because of potential effects on public safety" - why does fire protection have high, but not significant impact? Aren't there potential effects on public safety with fire protection too?

193

To Larry [illegible]
Comment [illegible] Public Hearing
Meeting Oct 27, 1982

From The Sandahl - City of Cheyenne
Capital Facilities Coordinator

503 One to the increase of vehicles mentioned in the mitigation for police department (2 cars), fire department (3 trucks), sanitation department (2 compactors), and sanitation department (2 pickup & vehicles) plus any other vehicles I do not mention,

We will have an Impact on our Fleet Maintenance facility. More staff will be needed to maintain these vehicles & more space will be needed for them to work in.

Please include this in subsequent mitigation analysis.

Sincerely,

[illegible]

19[illegible]

The City of Cheyenne, Wyoming 82001

794 [illegible]

261 [illegible]

Board of Public Utilities

Cheyenne Water and Sewer Departments

P.O. Box 1400 • Cheyenne, Wyoming 82003 • Phone 307 637 6460
2130 Pioneer Avenue

November 9, 1983

Major Peter Walsh, Director
Environmental Planning Division
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, Ca. 92409

RE: Draft Environmental Impact Statement (and secondary documents)

Dear Major Walsh:

The Cheyenne Board of Public Utilities has completed its review of the following Draft E.I.S. documents

1. Draft E.I.S. - October 1983
2. Draft EPTR, Public Services and Facilities - October 1983
3. Draft Environmental Planning Technical Report, Water Resources - October 1983
4. Draft EPTR, Utilities - October 1983
5. Draft EPTR, Socioeconomic - October 1983

A detailed response to these documents is enclosed.

Also enclosed are listings of the Projected Peacekeeper Impacts upon the Cheyenne Board of Public Utilities and the Cheyenne Board of Public Utilities Proposed Mitigation Plan. These listings could be summarized as follows

Impact items A and B (Raw water supply and treated water supply): With Nag Park, the collection system and Bob Lee being under construction for the next two years, and possibly one to two more years, Cheyenne will have to rely very heavily on the water in the Lacka, reservoirs and our well fields for the next few years. In addition to supplementing the raw water supply, the well fields will also have to produce additional supply during peak summer demand to meet additional impact demand. To help ensure that the well fields can meet these increased demands the well fields should be upgraded and possibly expanded. It is estimated that $1,760,000 would be needed for this purpose

Impact item C (Water distribution and storage supply): To help ensure that adequate water storage is available to help meet peak day demand and to help reduce the effects of minimum water pressure during peak water demand, an additional 5 million gallons of water storage should be constructed at the Saffle Ridge tank and the tank should be incorporated into the distribution system should be modified. This mitigation is estimated to cost $ 500,000

Impact item D (Wastewater collection): To protect the Cheyenne sewer system from being surcharged by increased flows from Warren Air Force Base, a properly designed flow restrictor should be installed just upstream of where the Base sewer system ties into the Board's sewer system. This mitigation is estimated to cost $7,500.

Impact item E (Wastewater treatment): The Peacekeeper impacts will increase the flows to the wastewater treatment plants and the E.I.S. recommends that the improvements listed in the recently completed 201 wastewater treatment plan be implemented immediately. Although there are no guarantees, it is possible that State and Federal funding could become available. Thus, $375,050 should be provided as impact mitigation, to assure that design and construction could begin immediately.

Impact item F (Personnel): Temporary personnel could be employed at a cost of $221,025 to mitigate the increased demand for taps, construction inspection, meter maintenance and meter reading.

Impact item G (Equipment): To meet the increased equipment demands of the Peacekeeper impacts the items could be leased at a cost of $259,740. However, it would be more cost effective to purchase these items at an estimated cost of $218,035.

Impact items H and I (Facilities and other Operational and Maintenance expenses): The increased revenue from the increased number of customers could offset these increased operational expenses. However, the Board will need to budget for these increased expenses.

The total estimated cost of this mitigation plan is $4,088,610.

Thank you for the opportunity to respond to the various Draft E.I.S. documents.

Please contact me if you have questions or need further clarification.

Sincerely,

Herman Noe

Herman Noe
Director

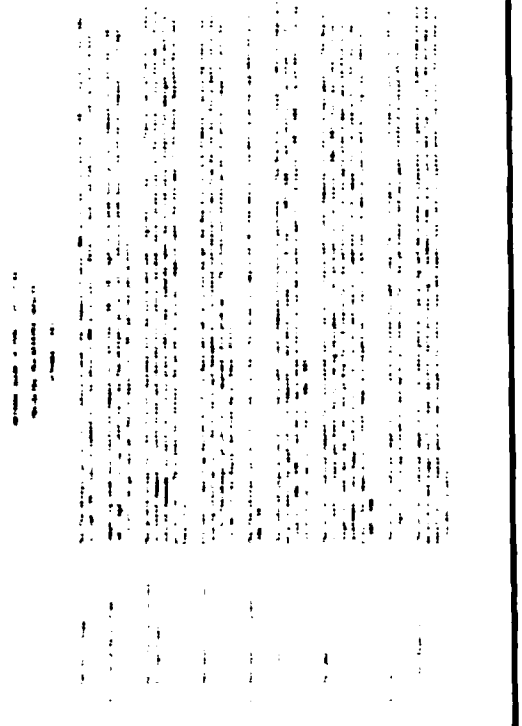
HN:mc

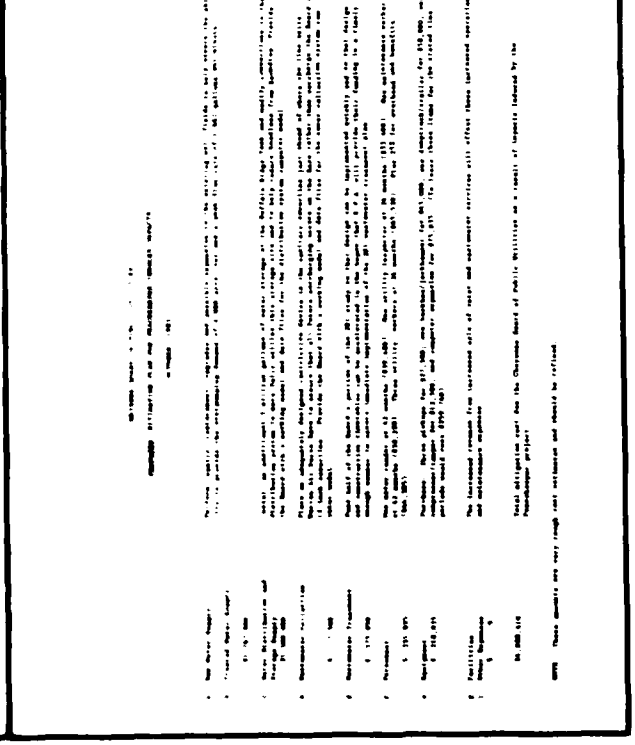
cc: Jim Applegate, President
Board of Public Utilities

Mayor Don Erickson

Tom Bonds, Regional Planning Office

Judy Ellis, Chairperson
Mayor's Water & Sewer Impact Committee





DETAILED RESPONSE TO PEACEKEEPER E.I.S. DOCUMENTS

Comments on Draft E.I.S.:

396 Page 2-12, Section 2.1.3.2.7. The figure $2,975,000 should be $2,950,000 and the figure $1.8 million should be $2.7 million. Also, it would be helpful in our review if the terms revenue and expenditure were defined.

591 Page 2-13 through 2-30, "Public Services and Facilities"; The Cheyenne Board of Public Utilities needs to be included in the evaluation of public services and facilities. The current Draft E.I.S. has not included an assessment of the Peacekeeper impacts upon the personnel and facilities of the Board of Public Utilities. Increased population will cause increased demands for service and would impact our need for backhoes, dump trucks, air compressors, pickups, water installation, personnel, construction inspectors, customer account clerks, water readers, computer capacity, inventory space, office space, vehicle maintenance facility and other. Copies of equipment and personnel data are enclosed.

840 Page 2-36; As per a letter to Major Walsh on October 11, 1983 (copy enclosed) the computer model of the Cheyenne area distribution system needs to be fine tuned before conclusions can be made as to the strengths or weaknesses of the distribution system.

841 Also, the paragraph entitled "2.1.7.2.1 Water Treatment and Distribution" fails to discuss water treatment for the Cheyenne service area. The E.I.S. should include discussion on water treatment.

842 Page 2-17; Table 2.1.7-1; The actual 1983 demand and capacities are as follows

Average Daily Demand	=	12.3 * mgd
Peak Day Demand	=	33.5 mgd
Storage Capacity	=	22 MG
Surface Water Treatment Capacity	=	26 mgd

Table 2.1.7-1 Should be corrected to reflect the actual data.

* The 1983 average daily demand is a projection based upon actual data for October - December 1982 and January - September 1983.

849 Page 2-36. The E.I.S. fails to discuss the Dry Creek Wastewater treatment facility of the Board of Public Utilities.

850 Page 2-37. The 9.1 mgd treatment capacity listed for the Cheyenne service area should be footnoted to explain that the 9.1 mgd capacity is determined by totaling each of the following capacities:

Dry Creek	4.5 mgd
Crow Creek	4.0 mgd
South Cheyenne Dist.	0.6 mgd
	9.1 mgd

1306 Page 2-94. 1980 was a census year and therefore should be used as a base year when studying Cheyenne's water supply and demand needs:

1980 service area population = 57,123
Total 1980 Water Consumption = 16,661 ac. ft.
(100% supplied by the Board of Public Utilities)

1307 Page 2-95. The schematic on page 2-95 demonstrates that Cheyenne's average historical net water supply is 13,030 acre feet per year. From the data displayed in Figure 2.2.1-2, the following net water yields can be determined

Groundwater Pumpage (wells)	=	3,330 ac. ft.
Crow Creek = 8400 - 6160 = .120	=	1,360 ac. ft.
Stage I Water Yield	=	8,140 ac. ft.
Total	=	13,030 ac. ft.

This is a valid conclusion for Cheyenne's average net water supply prior to 1982. The construction of the Stage II water supply project (1982-1986) will expand the annual water supply to vary during 1983, 1984, 1985 and 1986. After 1986 Cheyenne's raw water supply will increase due to the completion of Stage II.

1308 Page 2-97. It is stated at the top of page 2-97 that the average net yield of Crow Creek is 4,600 acre feet per year. Yet, Figure 2.2.1-2 demonstrates that the average net Crow Creek yield is 3,360 acre feet per year (8,400 - 6,140 - .120 = 1,360). The 1,360 is the acceptable current number. The 4,600 is over optimistic and is in error.

395 Pages 2-17 and 2-18, Table 2.1.3-1. The table should be corrected as shown on the enclosed example.

Pages 2-14 and 2-15, Tables 2.1.3-15 and 2.1.3-16. These tables should be corrected as shown on the enclosed examples.

591 Page 2-13 through 2-30. Public Services and Facilities, as indicated previously in the comments for pages 2-10 through 2-30, the Draft E.I.S. fails to evaluate the personnel, equipment and facility needs of the Board of Public Utilities due to the impacts associated with Peacekeeper. (Refer to previous comments for pages 2-10 through 2-30)

843 Page 2-108. Actual 1983 data show the Board's 1983 peak day water demand to have been 33.5 million gallons instead of the 27 mgd indicated in the Draft E.I.S. Also, the enclosed table of water demand projections shows the 1987 and 1990 potential peak day to be 36.5 and 39.7 mgd respectively, for baseline conditions.

840 As per the previous comments for page 2-36, I do not feel that the Draft E.I.S. can make any conclusions about our accurate assessments of Cheyenne water distribution system until the computer model developed for such a purpose is fine tuned to reflect actual operating conditions. (Refer to previous comments for page 2-36).

844 Page 2-139, Section 2.2.7.6.2.1 "Proposed Action"; A table, similar to the one enclosed, showing the projected population and corresponding water demands, should be included with this section so everyone can see what impacts are being discussed. For example, the 1987 peak day demand, with Peacekeeper impacts, would be as high as 36.7 million gallons (which far exceeds the current capacity of 33 million gallons). The Draft E.I.S. should also analyze the impacts upon the Board's treated water storage reserves when peak demand exceeds peak capacity.

845 The water storage reserves for emergencies and fire protection are seriously affected when they are used to make up the difference between peak supply and peak demand. It should be explained that the theoretical capacities of the Harry Nash and Soapstone Treatment Plants (20 mgd and 6 mgd respectively) is reduced to a net capacity of 19 and 5.5 mgd due to filter backwashing and the 1978 safe drinking water standards issued by E.P.A.

840 Page 2-[illegible] points out that accurate comparisons between water and water pressures for the Cheyenne distribution system cannot be made until the computer model used in this evaluation is fine tuned to reflect actual operating conditions.

913 Page 2-138, Section 2.2.7.6.2.1 The draft E.I.S. should encourage an alternate funding program for implementing the 201 wastewater facility plan so that Peacekeeper impacts can be adequately dealt with without violating water quality standards. EPA funding may be made available to the Board of Public Utilities.

848 Page 2-134, Section 2.2.7.6.2.1 "Proposed Action" In addition to the comments previously stated for page 2-138 the Draft E.I.S. should address a new item to the overcharging of the Board's 2 inch water line by the 4 inch water line from Warren Air Force Base. This is a serious problem that causes water storage reserves the betterment of 138 Talbot Court to flood. The impacts from Peacekeeper will add to this problem and a solution is necessary.

1308 Pages 2-134 and 2-142, Tables 2.2.1-2 and 2.2.1-3. The figures showing the Crow Creek yield to be in excess of 4,600 acre feet per year are in error. As demonstrated on page 2-95 (Figure 2.2.1-2) the average net surface yield of Crow Creek is 1,360 acre feet per year. (8,400 - 6,140 - .120 = 1,360). Table 2.2.1-2 needs to be corrected to reflect that the average annual net water yield from Crow Creek is 1,360 acre feet per year. Tables 2.2.1-2 and 2.2.1-3 should also be modified to include more information on evaporation vs. reservoir yield production, storage change and storage levels in the Board's water storage reservoirs. Increased water demand placed upon the Board of Public Utilities system as a result of Peacekeeper impacts. (Examples of the modified tables are enclosed.)

1309

1310 Page 2-138. By modifying the Tables 2.2.1-2 and 2.2.1-3 as described above it can be concluded that the Peacekeeper will place the following increased demand upon the Board's water supply system:

1986	13 acre feet
1985	713
1986	859
1987	953
1988	967
1989	961
1990	899

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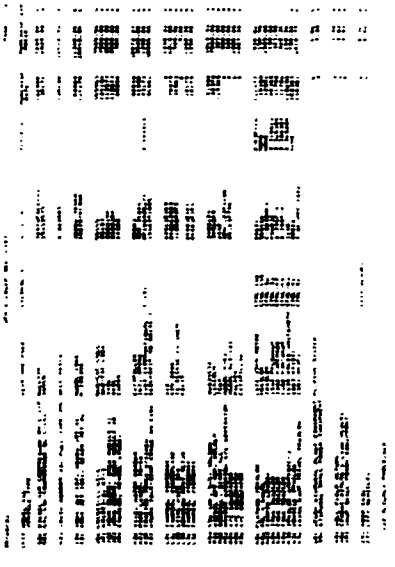
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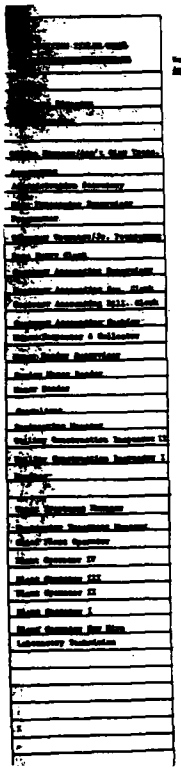
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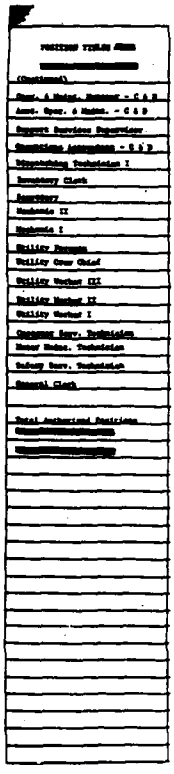
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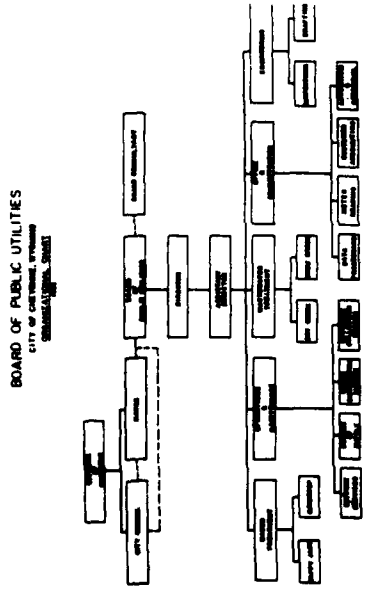
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Board of Public Utilities

Cheyenne Water and Sewer Departments

P O Box 1468 • Cheyenne, Wyoming 82003 • Phone (307) 637-6460
2100 Pioneer Avenue

October 11, 1983

Peter Walsh, Major, USAF
Director Environmental Planning Office
AFRCE - BMS/DEV
Norton Air Force Base, CA 92409

RE: Socioeconomic Impact Study for Peacekeeper, Cheyenne, WY, dated September 1983.

Dear Major Walsh:

In addition to my comments dated September 28, 1983, I submit the following comments.

On October 3, I received a copy of three computer printouts from the computer model of the Board of Public Utilites (BOPU) water distribution system. (I had previously requested a copy of these printouts from Eric Davidson). From the information I received, I deduced the following:

a. The Board of Public Utilities shop facility is 2 blocks northwest of Node 47. (Node 47 is an analytical point contained in the computer model.)

b. The Board of Public Utilities Montery Heights pumping station is about 6 blocks north of computer model Node 29.

c. The V.A. Hospital is just north of computer model Node 86.

From the computer printouts, the enclosed pressure reading charts and the enclosed letter from the V.A. Hospital, I determined the following:

NODE #	FACILITY	PRESSURE AS * PER COMPUTER MODEL	PRESSURE AS ** PER ACTUAL DATA
67	BOPU Shop	107 psi	76 psi
26	BOPU Pump Station	76 psi	54 psi
86	V.A. Hospital	93 psi	20 psi

* Computer Model Maximum Day Water Demand.
** Actual Maximum Period Water Demand.

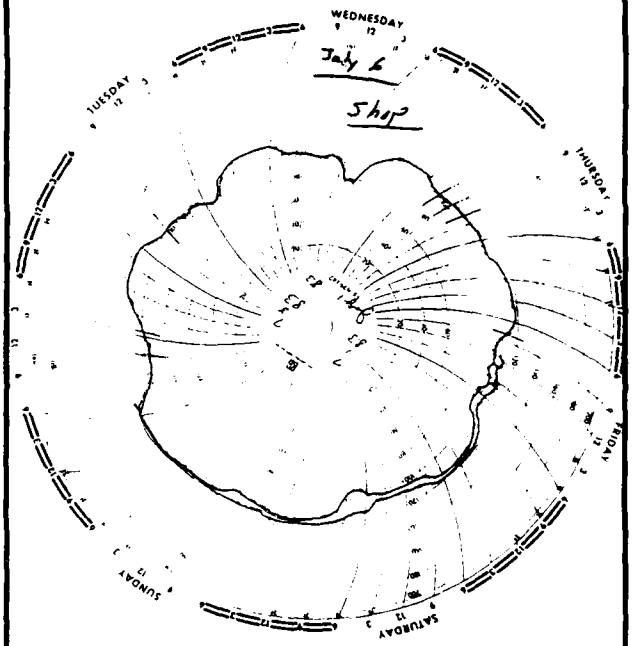
The computer model does not match well with actual conditions. The computer model needs to be adjusted to reflect actual conditions and the model needs to be modified to include detail. For example: the model doesn't reflect Western Hills, Montery Heights, Buffalo Ridge, Sunnyside, Sun Valley, the South Cheyenne District and other infill detail.

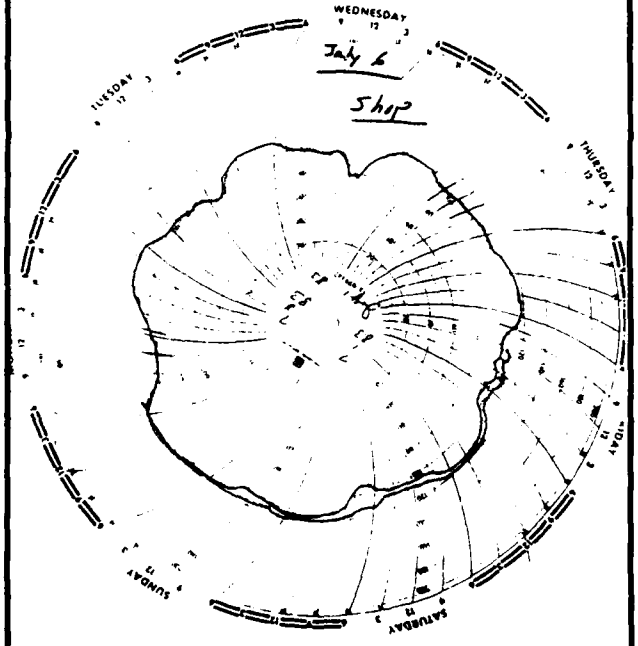
Sincerely,

Herman Noe
Director

cc: Eric Davidson, P.E.

HN:sh





Medical and Regional Office Center
2360 East Pershing Blvd
Cheyenne, WY 82001

Veterans Administration

September 7, 1983

Herman Noe
Director, Board of Public Utilities
2100 Pioneer Avenue
Cheyenne, WY 82001

Dear Mr. Noe

The Cheyenne Veterans Administration and Regional Office Center has been experiencing a lack of adequate water pressure for approximately one month. This loss in pressure has occurred almost daily between the hours of 4 p.m. to 8 p.m. and has dropped as low as 25 PSI. This compares to a normal pressure of approximately 100 PSI. Being new to Cheyenne, I asked my staff if we had experienced these problems in prior years. I have been told that we have not. Fortunately, an emergency water well was drilled on station in early 1983 and has been used when the pressure reaches 60 PSI. However, this well is for emergency purposes and is not intended to supplement the normal supply of water.

I indicated to you in our telephone conversation of August 26, 1983, that our engineer had contacted personnel in your office and had been given a variety of reasons for the drop in the water pressure. We are somewhat disappointed to think that your staff might know the reasons for this problem and have not communicated them to health care facilities in the community.

I would appreciate being provided with the reasons for this lack of water pressure and what actions are being taken towards their resolution.

Thank you for your prompt attention and reply.

Sincerely yours,

CHARLES G. BECK
Center Director

442/00

Table 3.1.3-15

BOARD OF PUBLIC UTILITIES
REVENUE AND EXPENDITURE PROJECTIONS
SEWERAGE NO ACTION

	1982 (Actual)	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
REVENUES											
USER CHARGES	1064536	1084700	1099600	1115300	1131076	1146543	1162802	1177499	1192965	1208432	1223902
PLANNING AND PERMITTING FEES	39625	40000	40000	41225	42112	43068	43264	43800	44416	44992	45563
MISCELLANEOUS	14667	14900	15000	15174	15500	15801	16014	16227	16449	16654	16866
SUBTOTAL	1118828	1139600	1154600	1171699	1188776	1205912	1221730	1237526	1253827	1270078	1286264
INTEREST	275632	90000	90000	95300	96403	97705	99005	100306	101606	102791	
TOTAL REVENUES	1394460	1229600	1244600	1266999	1285178	1303434	1319915	1336571	1354138	1371684	1389163
EXPENDITURES											
OPERATION	479192	488814	498591	508295	518460	528829	539406	550194	561198	572422	583870
ADMINISTRATION	330930	337549	344300	351186	358210	365374	372682	380135	387738	395493	403403
DEBT SERVICE	396000	396000	396000	396000	396000	396000	396000	396000	396000	396000	396000
TOTAL	1206122	1222363	1238891	1255481	1272670	1290203	1308088	1326329	1344936	1363915	1383273
ADDITIONAL CAPITAL OUTLAY AND DEBT SERVICE (1)	342784	342784	342784								
"201" REGIONAL WASTEWATER FACILITY & ASSOCIATED SYSTEM UPGRADING COSTS				957000	957000	957000	957000	957000	957000	957000	957000
DEBT SERVICE	2400000	2400000	2400000	2397210	2398800	2399887	2397501	2396292	2395269	2394021	2392791
CAPITAL COST	2742784	2742784	2742784								
SUBTOTAL	3948906	3965147	3981675	3609691	3628470	3647090	3662589	3679621	3697205	3713936	3732064

Notes: a City of Cheyenne Board of Public Utilities Annual Report, FY 1982.
Regional "201" Wastewater Facility Plan, 1982.

1 These expenditures are not included in the total as it has not yet been determined how these costs will be paid for.

3-56

1983 budget transfer of costs to Stage II = $75,000

1984 budget transfer of costs to Stage II = $75,000

3-58

Table 3.2.1-1

PROJECT WATER REQUIREMENTS

Year	1984	1985	1986	1987	1988	1989	TOTAL
Construction Water Demands (Acre-Ft)							
F. E. Warren AFB	13	49	5	-	-	-	67
Deployment Area	8	160	179	94	8	-	449
Nebraska Section	-	-	56	88	5	-	149
Wyoming Section	8	160	123	6	3	-	300
TOTAL:	21	209	184	94	8	-	516[b]
Induced Water Demands[a] (Acre-Ft)							
Cheyenne	-	684	773	888	610	382	3,057
Deployment Area	-	-	121	147	57	55	384
Nebraska Section	-	-	106	67	16	40	229
Wyoming Section	-	-	15	80	41	19	155
TOTAL:	-	684	894	955	467	441	3,441

Note: a A continuing operating demand in Cheyenne of 209 acre-feet/yr is expected in 1990 and later years. The Launch Control Facilities will continue to use 12 acre-feet/yr in the Deployment Area.

b Includes 100 percent for contingencies

Table 3.5.2

CHEYENNE BASELINE MUNICIPAL WATER DEMAND

Water Demand (acre-ft/yr)	1983	1984	1985	1986	1987	1988	1989	1990	1991
Industrial	2,500	2,600	2,700	2,800	2,900	3,000	3,100	3,200	3,300
Nonindustrial	12,080	12,240	12,400	12,560	12,730	12,890	13,050	13,210	13,370
TOTAL	14,580	14,840	15,100	15,360	15,630	15,890	16,150	16,410	16,670
Water Supply (acre-ft/yr)									
Net Import from Douglas Creek[1]	1,510	4,120	8,850	10,430	10,430	10,430	10,430	10,430	10,430
Crow Creek Watershed	4,150	4,150	4,150	4,150	4,150	4,150	4,150	4,150	4,150
Municipal Wells	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000
TOTAL	7,660	10,270	15,000	16,580	16,580	16,580	16,580	16,580	16,580
Supply-Demand	-6,920	-4,570	-100	+1,220	+950	+690	+430	+170	-90

Note: 1 Net import downstream of reservoirs. Net inflow to reservoirs is 2,100 acre-ft in 1983, 5,080 acre-ft in 1984, 10,080 acre-ft in 1985, and 11,710 acre-ft in later years.

Table 3.5.2

CHEYENNE BASELINE MUNICIPAL WATER DEMAND

Water Demand (acre-ft)	1983	1984	1985	1986	1987	1988	1989	1990	1991
Industrial	2,500	2,600	2,700	2,800	2,900	3,000	3,100	3,200	3,300
Nonindustrial	12,080	12,240	12,400	12,560	12,730	12,890	13,050	13,210	13,370
TOTAL	14,580	14,840	15,100	15,360	15,630	15,890	16,150	16,410	16,670
Water Supply (Acre-ft)									
Net Import from Douglas Creek[1]	1,510	4,120	8,850	10,430	10,430	10,430	10,430	10,430	10,430
Crow Creek Watershed[2]	4,150	4,150	4,150	4,150	4,150	4,150	4,150	4,150	4,150
Municipal wells[3]	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000
TOTAL	7,660	10,270	15,000	16,580	16,580	16,580	16,580	16,580	16,580
Supply Demand	-6,920	-6,430	-100	+1,220	+950	+690	+430	+170	-90

Note: 1 Net import downstream of reservoirs. Net inflow to reservoirs is 2,100 acre-ft in 1983, 5,080 acre-ft in 1984, 10,080 acre-ft in 1985, and 11,710 acre-ft in later years. Water diversion from Douglas Creek will be 2,000 acre-ft in 1983, 5,500 acre-ft in 1984, 10,700 acre-ft in 1985, and up to 12,000 acre-ft in 1986 and later years.

2 Crow Creek watershed supply equals 1,720 acre-ft/yr from North Crow and inflow to the Middle Crow reservoirs, less a share of existing evaporation and spillage losses which are apportioned based on the percent of total flow to the reservoirs from import water and watershed inflow.

3 Assumes total pumpage is reduced to 2,500 acre-ft/yr and irrigation use remains at 500 acre-ft/yr.

Table 3.5.11

WITHIN MUNICIPAL WATER DEMAND PROPOSED ACTION
ACRE FEET

	1981	1984	1985	1986	1987	1988	1989	1990	1991
Water Demand									
Baseline	14,580	14,840	15,100	15,360	15,620	15,880	16,150	16,410	16,670
With Project	14,580	14,850	15,830	16,140	16,440	16,300	16,530	16,670	16,880
Water Supply									
Stage I & II Import	1,510	4,120	8,850	10,430	10,430	10,430	10,430	10,430	10,430	
Crow Creek Watershed	4,150	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	
Municipal Wells	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	
TOTAL	7,660	10,120	14,850	16,430	16,430	16,430	16,430	16,430	16,430	
Supply - Demand									
Baseline	-6,920	-4,720	-251	+1,070	+810	+550	+280	+20	-240	
With Project	-6,920	-4,730	-980	+290	-10	+130	-100	-240	-450	

Note: with project water demands rounded to the nearest 10 acre ft

Board of Public Utilities

Cheyenne Water and Sewer Departments

P.O. Box 1469 · Cheyenne, Wyoming 82003 · Phone 307 637-6458
2100 Pioneer Avenue

September 28, 1983

Peter Walsh, Major, USAF
Director Environmental Planning Office
AFRCE - BMS DEV
Norton Air Force Base, CA 92409

RE: Socioeconomic Impact Study for Peacekeeper, Cheyenne, WY, dated September, 1983

Dear Major Walsh:

As per your September 15, 1983 letter, I appreciate the opportunity to respond to the Draft Socioeconomic Impact Study. My comments would be as follows:

Wyoming Statutes 15-7-601 through 15-7-612, 1977, authorize and charge Boards of Public Utilities with the responsibilities of operating, constructing, maintaining, and equipping and staffing the municipal departments of water and sanitary sewer. In general, the Socioeconomic Study did not include an

890 assessment of the Board of Public Utilities.

Appendix D, "Selected Facilities Condition and Capacity Survey", this survey failed to adequately inventory, assess and study the facilities of the Board of Public Utilities (BOPU). There is no mention of our office shop and maintenance facilities at 2400 Snyder Avenue, nor our two water treatment facilities, nor our two wastewater treatment facilities, nor our equipment, nor our personnel.

789 Page E-1 should include an inventory of major capital equipment of the Board of Public Utilities as was done for the Fire Department, Police Department and other municipal departments. Please refer to the enclosed listing.

Pages 4-7 and 4-8. The staff and space needs and impacts for the Board of Public Utilities should be assessed and listed along with the other municipal government impacts listed in the report.

Page 3-37. The Board of Public Utilities (departments of potable water and sanitary sewer) should be included under section 3.3.12 Utilities. Currently, only the odor sewer facilities and equipment needs of sanitation (garbage collection) were evaluated and discussed.

Page 3-38. The mitigation measures for the Board of Public Utilities should be included in section 3.4.11 Utilities. Only mitigation for the facility, equipment and personnel needs of the sanitation department is currently discussed.

891 The Peacekeeper project will have impacts upon the water and sanitary sewer services similar to those listed for the police, fire and sanitation departments. Proper mitigation must be developed for the impacts upon the facilities, equipment and personnel of the Board of Public Utilities. Increased service demand could impact the need for backhoes, dump trucks, air compressors, pickups, meter installation, personnel, construction inspectors, customer payment clerks, meter readers, computer capacity, inventory space, office space, possible maintenance facility and other.

Page 3-37, Section 3.2.1.1.2 Staffing. The Board of Public Utilities should be included in the discussion on staffing. A current listing of authorized labor of the Board of Public Utilities is enclosed.

Page 3-39, Cheyenne Organizational Chart. The "Water Depart. H. Hoe" should be listed as the "Board of Public Utilities" (departments of water and sanitary sewer). The organizational chart of the Board of Public Utilities is enclosed.

Page 3-40. The Board of Public Utilities should be included in the discussions concerning staffing.

789 Page 3-43. The listing of authorized labor (see enclosure) for the Board of Public Utilities) should be made part of this section as a separate table 3.2.1-3.

Page 3-44, Section 3.2.1.1.3 Capital Facilities. A separate section for the Board of Public Utilities facilities needs to be added to the study.

Page 3-44, Section 3.2.1.1.4 Capital Equipment. A separate section for the Board of Public Utilities equipment needs to be added.

Pages 3-45, 3-46, 3-47 and 3-48. New sections need to be added to include the Board of Public Utilities, which currently has been overlooked by the Socioeconomic Study.

915 Page 3-49, last paragraph. The statement, "(i.e., exceeds capacity and floods streets above.)", should be modified to include the flooding of basements along the route of the 12 inch sewer. The surcharging from the Air Force sewer system also causes flooding of basements along the Board's 12 inch sewer main.

912 Page 3-61, last sentence. The Socioeconomic Study states, "The extant 201 Plan (Bonner Associates 1982) would solve all these problems, and it is assumed that the plan will be implemented in the near future." The Socioeconomic Study should not assume that the 201 Plan will soon be implemented. Implementation rests upon funding. It is hoped that 75% funding becomes available through the E.P.A. grants program, 10% to 20% funding becomes available from the State of Wyoming and the balance (5% to 15% funding) is available form the local governments. However, the Socioeconomic Study should develop a plan to assure funding for the 201 Plan. Page 3-56 states "Hence, all the treatment plants need relief or expansion". Page 3-59, Section 3.2.2.4 Mitigation Measures states "Without question, of greatest importance is the early implementation of the existing 201 Facilities Plan... This implementation will solve all existing, baseline period and project period treatment problems." These statements make it clear that

913 implementation of the 201 Plan is necessary to assure that the impacts during the peak project years (1986/1987) are satisfactorily dealt with. Thus, implementation of the 201 Plan cannot be left to hopeful assumptions. A plan for guaranteed funding must be developed.

916 The Socioeconomic Study should include a masterplan (a map) of how the sewer collection system should be expanded to serve the growth areas developed as a result of the Peacekeeper Project. Cheyenne's current growth areas are north, east and south.

902 Page 3-64. The 1983 maximum day demand is stated as 30.0 mgd. Since the 1980 peak day was 31.5 mgd (million gallons per day) the 1983 peak day should be 32.8 mgd. (The population information on pages 3-37 and 3-38 show Cheyenne's service area population to have grown by 4.1% from 1980 to 1983). Thus the potential peak water demand for 1983 should also be 4.1% greater than the peak day of 1980.

903 Page 3-c. In addition to using the criteria of 20 psi at fire hydrants as a parameter for detecting low pressure problems, the study should point out all the areas where the pressure zone drops below 50 psi. It may not be a text book criteria, but the residents of the Cheyenne service area expect a minimum service pressure of 50 psi. (See letter enclosed from the United States Veteran's Administration Hospital.) Maps showing low pressure zone areas should be included in the study.

904 Page 3-65, Section 3.2.3.2. The 1990 baseline water service population of the Board of Public Utilities (including Warren Air Force Base) should be 64,745 as stated on Table 3.2-i on page 3-38. (This includes a 3,700 population for F.E. Warren.) Thus, proportionately, the maximum day water demand for 1990 should be 35.7 mgd. (1980 statistics compared to 1990 projections show a 13.3% baseline increase in service population.) Also, the study should again point

903 out the pressure zones that are below 50 psi during maximum day and peak period maximum day demands.

897 Page 3-62 through 3-67. The analysis on water treatment and distribution needs to include a study of treated water storage capacities during peak period on peak day, peak day and peak week demand. During the peak impacts of the Peacekeeper Project, the treated water storage tanks must maintain an adequate reserve for fire demands and emergency reserve.

895 Page 3-69. In addition to the alternatives offered for mitigation of the impacts on water treatment, the study should also state that a new supply of 5.7 mgd could be developed by drilling new wells and tying them to the existing system. Peak 1987 demand of 36.7 mgd minus the peak treatment capacity of 31.0 mgd leaves a difference of 5.7 mgd.)

898 Page 3-69. The suggested mitigation for the Peacekeeper impacts upon the Board's distribution system should be re-evaluated after the Socioeconomic Study future evaluates the potential for low pressure zones based upon the conditions of a minimum service pressure of 50 psi (which is the expected low pressure condition for Cheyenne).

907 Pages 3-62 through 3-69. The analysis in the Socioeconomic Study needs to be expanded and include more detail on the impacts within the boundries of the South Cheyenne Water and Sewer District. The computer models displayed on pages 3-50 and 3-63 do not extend far to the south of Interstate Highway I-80, which is the area of the District.

843 It is suggested that the population and water demand table for the Board's water and sewer service area, be included in the Socioeconomic Study. A copy of such a table is included with this letter.

900 The Socioeconomic Study should address the issue of financing, funding for the items needed to mitigate the impacts of the Peacekeeper project.

901 I ask that the Cheyenne Board of Public Utilities be given working copies of the computer models of the water distribution and sanitary sewer collection systems to include schematic maps, assumptions, data files, output listings from all computer runs made on the models, copies of the programs for application on the Board of Public Utilities computer. This will benefit the Board of Public Utilities service area population as we deal with the growth impacts associated with the Peacekeeper project. The current computer models make assumptions that may need to be modified each year as the actual Peacekeeper impacts are experienced. The Board of Public Utilities could use these computer models to cope with the impacts of growth on an almost continuous basis. Now that these computer models have been developed, I can not see that it would cost the federal government much to provide the Board of Public Utilities with working models and data files.

Since my comments are quite extensive, I ask that I be given the opportunity to review the revised work prior to the issuance of the Draft E.I.S.

Sincerely,

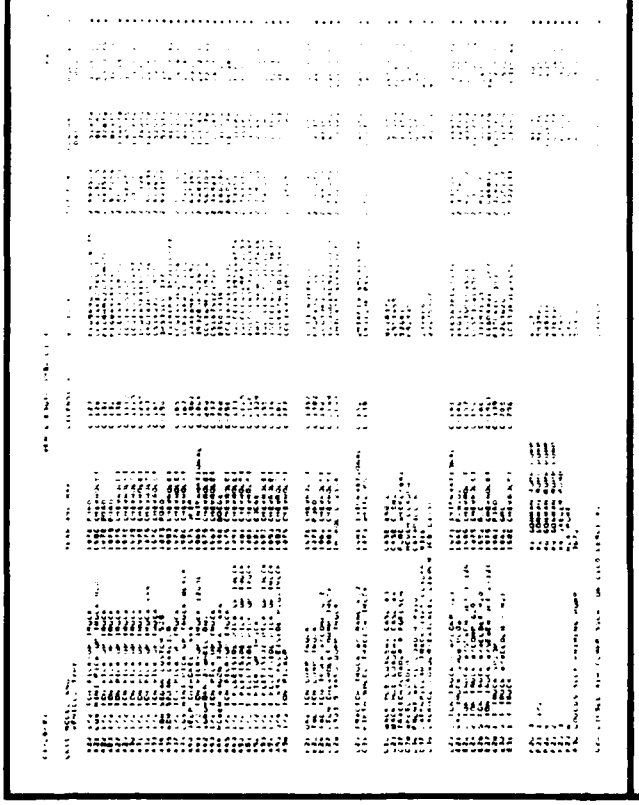
Herman Noe

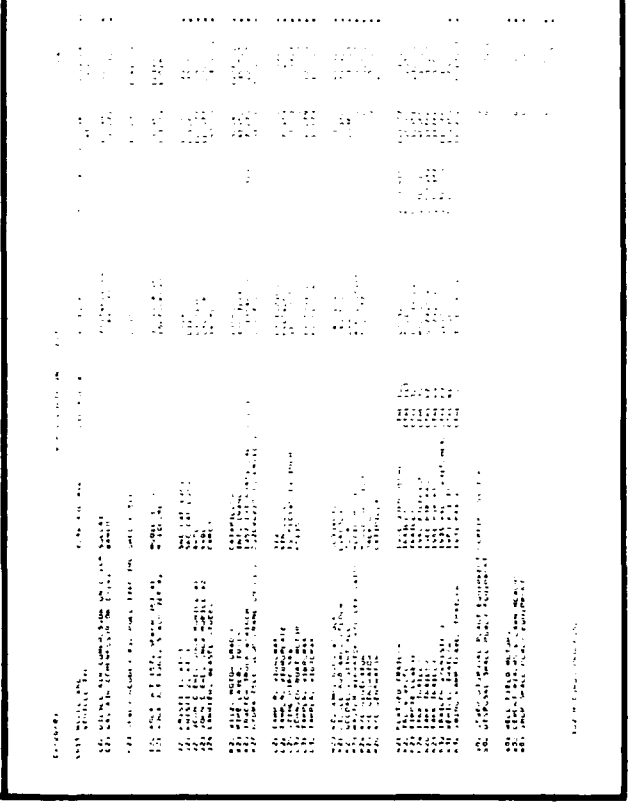
Herman Noe
Director

Enclosures

cc Tom Bonds, Planning Office

HN sh

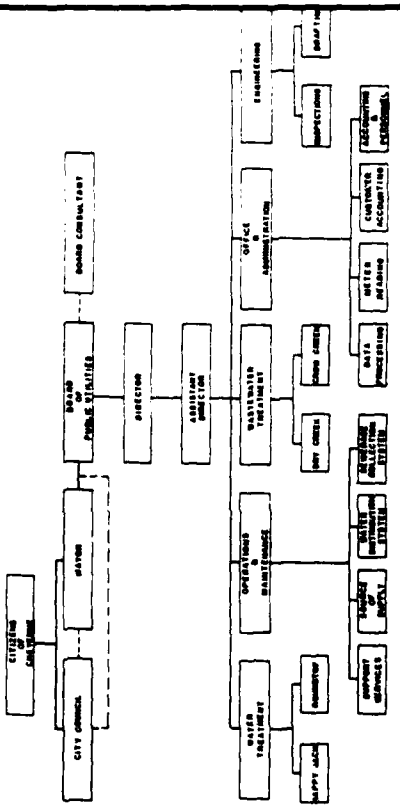




POSITION TITLES [redacted]	Number of Authorized Employees
Director	1
Assistant Director	1
Superintendent	1
Office Manager/Asst City Treas.	1
Accountant	1
Administrative Secretary	1
Data Processing Supervisor	1
Programmer	1
Computer Operator/Jr. Programmer	1
Data Entry Clerk	1
Customer Accounting Supervisor	1
Customer Accounting Sen. Clerk	1
Customer Accounting Bill Clerk	2
Customer Accounting Cashier	1
Meter Inspector & Collector	1
Meter Reader Supervisor	1
Senior Meter Reader	1
Meter Reader	3
[redacted]	1
Technician Trainee	1
Utility Construction Inspector II	1
Utility Construction Inspector I	1
Drafter	1
Water Treatment Manager	1
Instrument Treatment Manager	1
Chief Plant Operator	1
Plant Operator IV	1
Plant Operator III	1
Plant Operator II	1
Plant Operator I	1
Plant Operator Trainee	1
Laboratory Technician	1

POSITION TITLES [redacted] (Continued)	Number of Authorized Employees
Oper. & Maint. Manager - C & D	1
Asst. Oper. & Maint. - C & D	1
Support Services Supervisor	1
Structural Maintenance - C & D	1
Engineering Technician I	1
Inventory Clerk	1
Secretary	1
Mechanic II	2
Mechanic I	1
Utility Foreman	2
Utility Crew Chief	4
Utility Worker III	4
Utility Worker II	5
Utility Worker I	3
Customer Serv. Technician	2
Water Maint. Technician	1
Safety Serv. Technician	1
General Clerk	1
Total Authorized Positions [redacted]	89

14



15

Medical and Regional Office Center

2360 East Pershing Blvd
Cheyenne WY 82001

Veterans Administration

September 7, 1983

Herman Hoe
Director, Board of Public Utilities
2100 Pioneer Avenue
Cheyenne, WY 82001

Dear Mr. Hoe

The Cheyenne Veterans Administration and Regional Office Center has been experiencing a lack of adequate water pressure for approximately one month. This loss in pressure has occurred almost daily between the hours of 4 p.m. to 8 p.m. and has dropped as low as 25 PSI. This compares to a normal pressure of approximately 100 PSI. Being new to Cheyenne, I asked my staff if we had experienced these problems in prior years. I have been told that we have not. Fortunately, an emergency water well was drilled on station in early 1983 and has been used when the pressure reaches 60 PSI. However, this well is for emergency purposes and is not intended to supplement the normal supply of water.

I was advised to you in our telephone conversation of August 26, 1983 that our engineer had contacted personnel in your office and had been given a variety of reasons for the drop in the water pressure. We are somewhat disappointed to think that your staff might know the reasons for this problem and have not communicated them to health care facilities in the community.

I would appreciate being provided with the reasons for this lack of water pressure and what actions are being taken towards their resolution.

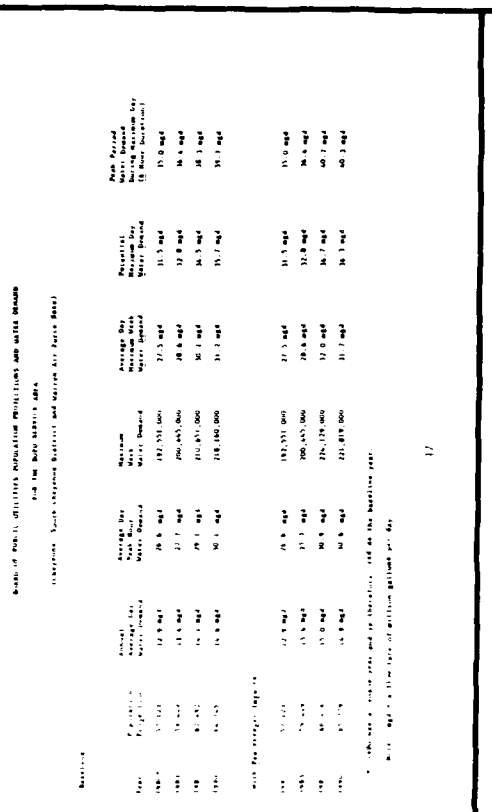
Thank you for your prompt attention and reply.

Sincerely yours,

CHARLES G. BECK
Center Director

16

442/00



197

The City of Cheyenne, Wyoming 82001

City Engineer's Office
2101 O'Neil Avenue

CITY COUNCIL
ROBERT STOREY
PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M.F. "MARK" JERTSON
WANDA MCCUE
GEORGE SCOTTY REID
RONALD N. ROGERS

November 28, 1983

Major Peter Walsh, Director
Environmental Planning Division
Department of Air Force AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

The attached are our comments on the DEIS.

2 If you have any questions please contact the authors of the individual items.

Sincerely,

Gary L. Grunkemeyer
Director of Public Works/City Engineer

GLG:jr

cc: Mark Shaff
File

THE HOME OF CHEYENNE FRONTIER DAYS

198

The City of Cheyenne, Wyoming 82001

City Engineer's Office
2101 O'Neil Avenue
Cheyenne, Wyoming 82001

DON ERICKSON
CITY COUNCIL
ROBERT STOREY
PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M.F. "MARK" JERTSON
WANDA MCCUE
GEORGE SCOTTY REID
RONALD N. ROGERS

MEMORANDUM

TO: Gary L. Grunkemeyer, City Engineer
Director of Public Works

FROM: Roger Peterson, P.E.
Assistant City Engineer

DATE: November 3, 1983

SUBJECT: MX Impact Analysis: DEIS Review

1. RE: Warren Air Force Base Upgrade

865 It is my understanding that WAFB will be upgraded and that this upgrade was not analyzed in the report. Upgrading WAFB could result in increased runoff from the base, and could affect downstream drainage area. For example, the Dry Creek Master Drainage Plan does not anticipate further development of WAFB. The up-grading of the base and the potential for increased runoff should be addressed.

2. RE: Rainfall intensity.

855 a. The rational method uses rainfall intensity equal to the time of concentration of the basin in question. The time of concentration should be identified for each basin, and a corresponding rainfall intensity should be used.

856 b. Table 2.3.5.-1 underestimates the 25 year event for Cheyenne, Wyoming and should be revised. All calculations useing this event in the text should also be revised.

3. RE: Rational Method

857 a. The rational method is incorrectly applied occassionally in this section. The method should be applied, at a maximum, to 200 acre areas, for planning purposes.

THE HOME OF CHEYENNE FRONTIER DAYS

MEMORANDUM
Gary L. Grunkemeyer
page 2

858 b. The report should divide large basins into hydrologically similar subbasins and route storm water flow from one area to the next. At a minimum, both pre-and post-development impacts should be compared using the SWMM Mode. for all impact areas, including South Cheyenne.

859 c. Pre-and post-development flood volumes should be addressed along with flood peaks. The report should address the need for attenuation of flood peaks and the approximate size of structures that will be required. Please note that the 100 year flood volume should be analyzed.

d. The methodology used in comparing pre-and post-development storm flows is too general even for early planning requirements. For example, the method does not address.

860 1) Additional facility construction required by the increase in population (i.e. recreation facilities, Parking lots, parks, shopping centers, etc., which will contribute to drainage impacts.

2) Impacts on the capacity of existing down stream drainage facilities due to upstream development. In many cases, an additional load on the downstream drainage network will exceed the capacity of the downstream system. Even if flooding is currently occuring down-gradient, and increase of many acre-feet of water to the area down gradent could form a nuisance area into a disaster area. The effect of development on existing facilities should be analyxed for all impacted areas.

3) The method of Selection of a "C-value" in the equation is unclear. For example, what is the "C-value" used for undeveloped area? Why is a "C-value" as low as 0.5 used for mobile home parks, when site preparation methods specifically discourage infiltration?

4. RE: Operation and Maintenance

861 The study should address the increased operation and maintenance costs to the City to permanently maintain the additional storm drain network. The study should also address the additional maintenance costs for the existing storm drain network incurred due to sedimentation from development sites.

5. RE: Mitigative Measures

862 This section should be re-written after addressing the four comments above.

6. RE: Population Distribution and Upgradient Development

863 Population distribution estimates are made for the traffic study, thus the impact on the storm water drainage network can be addressed considering a general population distribution. In the event that population distribution estimates are revised, the storm drainage sections will likewise need to be revised.

864 Particular concern is placed on existing developments in and near major drainageways that have not been studied because of the current absence of upstream development. The impact on the developed areas downstream due to upstream development will be substantial in these areas because, although historic peak flows will be approximately maintained, it must be recognized flood volumes will be substantially increased. The result of increasing flood volumes due to development is obvious when combined with the lack of downstream conveyance structures. This effect needs to be considered.

7. RE: Materials

455 a. The increase in price and the decrease in availability of ready-mix and its impacts on city residents and city services should be addressed.

456 b. The increase in price and the decrease in availability of sand and gravel and its impacts on the city residents and city services should be addressed.

8. RE: Inflated cost of labor

425 The impact on city services and on city residents caused by the increased cost of services and the inflated cost of labor should be addressed.

sm

The City of Cheyenne, Wyoming 82001

City Engineer's Office
2101 O'Neil Avenue
Cheyenne, Wyoming 82001

199

MAYOR
CITY COUNCIL
PRESIDENT
WILLIAM ANDERSON
JOHN CLARK
GEORGE SCOTT, REID
RONALD L. ROGERS

MEMORANDUM

TO: John Sandahl, Capital Facilities Coordinator

FROM: Roger Peterson, P.E.
Assistant City Engineer

DATE: September 29, 1983

SUBJECT: MX Impact Analysis:
WNSIS Study Review

The following review emphasizes Section 3.2.5, storm water drainage.

A. Section 3.2.5

1. RE: Text readibility

943 The text is almost unreadable. It is difficult, if not impossible, to compare pre-development and post-development impact numbers. The text appears to draw comparison from thin air. The text should be re-written for clarity, identify the areas being discussed on a map, and include at least one table comparing pre-and post-development runoff. The text should further identify numerical and other assumptions being made.

2. RE: Warren Air Force Base Upgrade

954 It is my understanding that WAFB will be upgraded and that this upgrade was not analyzed in the report. Upgrading WAFB could result in increased runoff from the base, and could affect downstream drainage areas. For example, the Dry Creek Master Drainage Plan does not anticipate further development of WAFB. The up-grading of the base and the potential for increased runoff should be addressed.

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948 d. The methodology used in comparing pre-and post-development storm flows is too general even for early planning requirements. For example, the method does not address:

1) Additional facility construction required by the increase in population (i.e. recreation facilities, parking lots, parks, shopping centers, etc. which will contribute to drainage impacts.

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Cheyenne, Wyoming

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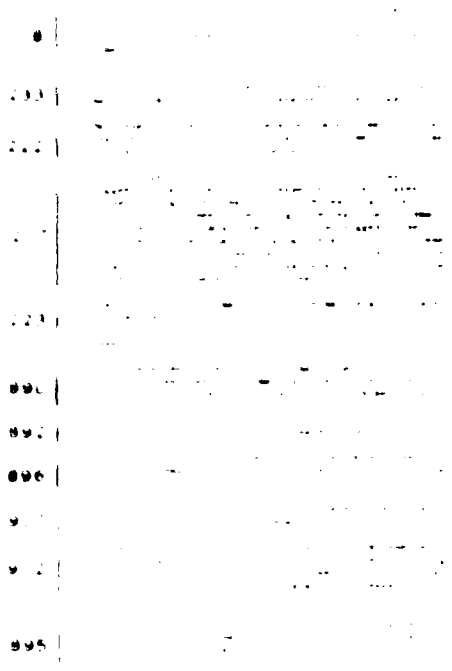
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6.2-125



894 [illegible] the analysis needs to be done at the timing of [illegible] evaluation of the construction of the Phase II [illegible]

[illegible]

371 The study assumes that 60% of the population will move [illegible] temporary housing south of the City limits. The location of these units in the south Cheyenne area presents an [illegible] infrastructure problems.

341 The committee does not favor the lowering of standards or substantially altering codes just to make it easier [illegible] would needed housing.

357 The study appears to underestimate the demand for multi-family housing.

356 There is a concern for housing the unemployed which are attracted to the community.

358 The housing issue is a one of and primary impact and must be resolved prior to much detailed work being done in other impact areas.

[illegible] Air Force

776 The conclusion that the facilities, both space and equipment, are adequate is incorrect and needs to be reexamined. The study did not examine the overall capability of Civil Defense to respond to civilian emergencies such as blizzards and floods, especially in regard to programatic aspects.

The study, in fact, did not mention the Department at all, other than in a list of Departments in the County and under the facilities section in the appendix. No mention is made of the load on emergency dispatch and communication. This is a major oversight in the WNSIS and is typical of other oversights where full departments have been left out of discussion or lumped into large groups.

[illegible] Capital Improvements

1037 The whole assumption of the southside location may be in error because of the action of the Southside Water and Sewer District Board of Directors. If this is the case, all data and analysis on transportation are inadequate and need to be completely redone.

1073 If the southside option is accurate, not enough education activities are planned in the southside area. The study completely overlooks the need for pedestrian and child safety in the area.

1059 [illegible]

1071 [illegible]

984 [illegible]

[illegible] Engineer

999 The [illegible] would cover the area from [illegible] to the [illegible] and improvement of the [illegible] Pioneer Parkway and the [illegible] the Ranchette Interchange. The second [illegible] improvements [illegible] Dell Range from Yellowstone Road to the [illegible] and Missile Drive intersection and the [illegible] College Drive intersection. Other projects are [illegible] under third and fourth priorities.

1073 [illegible] the project priority list, but a major problem area is the pedestrian and school safety concerns on the southside and improved inbound and outbound traffic signal balancing from the Downtown area.

Street & Alley:

1011 No routing of construction equipment and materials onto the Base and outlying areas.

1036 Major problem in locating the majority of people in south Cheyenne where study indicates that transportation system is over capacity and undeveloped.

1059 Ignores the fact that roads in the residential area of south Cheyenne are unimproved or only partly improved and many are private roads and do not meet residential standards.

Airport Manager:

1013 The whole section is based on an outmoded and unrealistic master plan.

1014 The existing runways are planned for update but timing is not adequate for MI unless FAA monies are speeded-up.

1015 Additional parking is a problem As are more gates and passenger seating. Both are mentioned but the level of the problem is not recognized and mitigation is not suggested.

South Cheyenne Water and Sewer:

The figures in the study if calculated out result in an increase in the population for the area between 34% and 15%, the largest impact on any area covered by the WNSIS.

956 I will quote from the conclusion to Jon Arason's memo, I would suggest that you read the complete memo. "What is needed in the WNSIS and is not present is a detailed analysis of the adequacy of the facilities in the district to serve a sudden 15% increase in population. Today there are no sidewalks, the roads are gravel, there are no parks, drainage problems are serious, the treatment plant is overloaded, water pressure is dropping, traffic control is basically nonexistent, school children are bussed out, the road system is contorted. The projected impact on the South Cheyenne Water and Sewer District will exacerbate all of these problems and it is questionable whether an area so lacking in public services should be targeted to receive the brunt of impact without a detailed, area specific analysis. Five pages simply is not enough. The projected immigrant population to the City will result in a 3% population increase, yet there are at least 100 pages devoted to impact on the City. The District opposes, and will continue to oppose unique problems due to its unique situation. The WNSIS is completely inadequate in relation to the District because it has failed to address the District's unique area specific problems, and as a result has offered no mitigation strategies suited for this most heavily impacted area in the region."

City Administration:

794 1. The impact will be greater than projected.

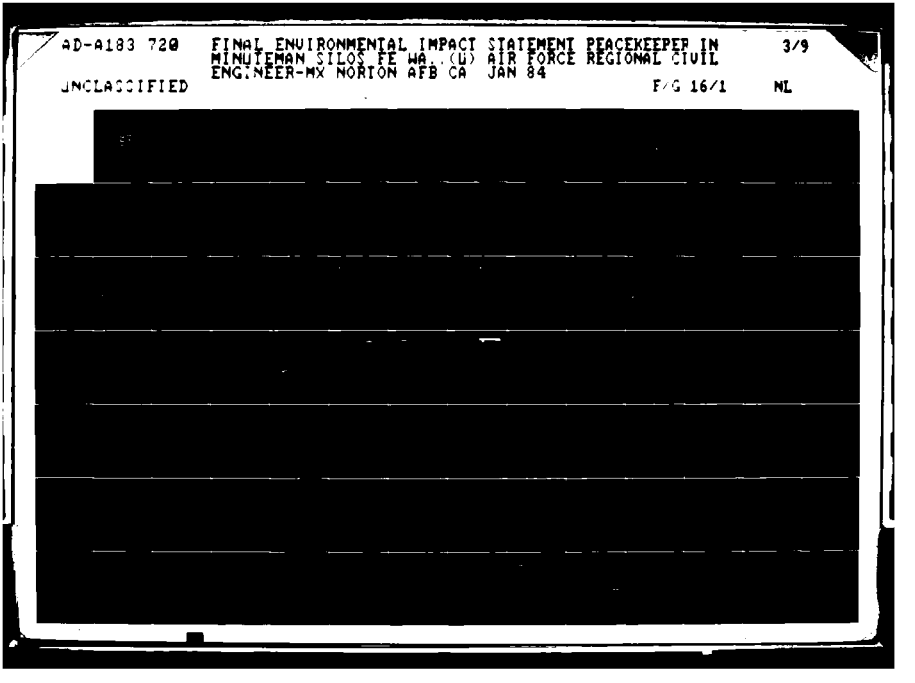
795 2. In discussions with Ross Johnson and other administrators the use of a formula, rather than the looking at specific proolem areas and projecting impact based upon their unique situations. is not an acceptable approach. The formula approach would be okay only after it has been determined that there are no special service nor service specific [illegible] needed.

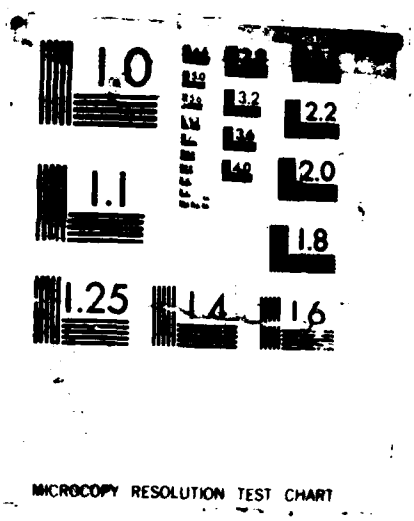
Public Works Impact Team:

287 1. Ignores simultaneous [illegible] areas and resulting effect [illegible]

AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 3/9

UNCLASSIFIED F/G 16/1 NL





MICROCOPY RESOLUTION TEST CHART

649 | 2. Law Enforcement space needs are badly underestimated in the Law Enforcement section because the formula used is not applicable to Police.

634 | 3. Timing of the construction of the Law Enforcement Facility is probably inaccurate and will take longer than 1985, also simultaneous construction demand will increase project cost by increasing materials cost and labor cost.

694 | 4. Speeding up projects already planned, for example the Fire Station, will result in a use cost or lost opportunity cost. For example, spending of $450,000 seven years early for a new fire station will result in a cost over $320,000.

Solid Waste Disposal:

923 | 1. No description of solid waste disposal equipment. (I am not sure that this is completely accurate).

930 | 2. Jerry Morse is uncomfortable with the figures and conclusions, however Felix Pino appears to be satisfied although he thinks that the figures may be low.

Drainage Problems:

951 | 1. As far as drainage goes, south Cheyenne is one of the worst possible locations.

938 | 2. More detail needs to be provided on problems with the use of surface drainage. The surface study suggests additional surface drainage rather than underground.

941 | 3. Mitigation not specific enough, more detail needs to be provided on where to place drainage, where to construct it, what size etc. which may not be possible now.

943 | 4. The whole section needs to be rewritten. It is unreadable and extremely difficult to compare clearly the pre and post development runoff.

944 | 5. Technical problems with the runoff estimates. The 25 year flood is underestimated, the basins selected are questionable and perhaps to general. Does not address runoff from new facilities or accurately predict runoff from such developments as mobile home parks.

946 | 6. Does not look at impact on downstream drainage facilities due to upstream development. As we all know, this is a major problem in Cheyenne.

940 | 7. Does not address at all maintenance costs for new facilities.

245 | 8. Does not consider increase in price and decrease in supply of materials or manpower. Particularly, concrete, sand, and gravel on all projects.

Fire:

698 | Chief Garey is generally satisfied with the Fire Protection section.

Youth Alternatives:

750 | 1. Underestimates the need by underestimating the current staff thus throwing off the ratio.

757 | 2. Remodeling and use of basement is recommended, but cost is not mentioned.

753 | 3. Not reasonable to continue to project understaffed condition already admitted in the WNSIS. Adequate staff should be provided for impact. Only the catch up necessary to meet standards today should be the responsibility of the community.

764 | 4. Admits generally that problems are disproportionate is the impact population, but does not apply any multipliers when computing need for additional staff. Also mentions destablizing factors of impact on youth but again fails to include multipliers for this problem. This approach is generally followed in other areas in the WNSIS. If the impact cannot be quantified, it is ignored in the mitigation.

Land Use Impact Team:

1149 | 1. Study does not adequately assess enforcement needs in the areas of zoning and nuisance.

1150 | 2. Overtime as a mitigation method to cover planning, engineering, and zoning load is not a realistic mitigation approach.

355 | 3. The Land Use Committee suggests that the oversupply of housing in Wheatland be considered as a resource.

377 | 4. Motel space during the summer is not a housing option unless tourist income will be replaced by the Federal Government.

620 | 5. Estimates impact on LCCC suggest some impact, but does not analyze training needs and programs. It says only that this cannot be predicted. This is absolutely incorrect and totally unacceptable. More work needs to be done on the LCCC and the training responsibilities

620 | and needs of the community.

956 | 6. The discussion of impact on the south Cheyenne area is inadequate.

1149 | 7. No discussion of the general planning process and the impact and load on personnel in the planning area.

341 | 8. The Committee does not support lowering housing policy standards and regulations.

66 | 9. Underestimates the impact on Pine Bluffs, Burns, and Albin.

99 | 10. Mitigation recommendations are to general and fall short of what is necessary and must be more specific in regard to staff facilities and equipment. This is a short fall for the entire document.

Police:

634 | 1. Law Enforcement facility will not be ready as projected in 1985. Impact needs to be discussed.

654 | 2. Current level of vehicles is one for each officer not one for each 3.5 officers.

649 | 3. Facility needs grossly underestimated. Extensive documentation on this is included.

652 | 4. Ignores manpower secondary multipliers, a common short fall. Study admits that there is a disproportionate increase in crime particularly in Part Two crimes and is "calls for service" but does not change the 1.7 per one thousand resident multiplier. This is an unrealistic estimate.

659 | 5. Completely ignores the whole civil disturbance issue and the resulting manpower and management requirements.

656 | 6. The reports from the Chief and his Captains all support the one on one car plan as a major help.

648 | 7. Overestimates the handling capacity of the Jail.

660 | 8. Assumption that Type I crimes do not increase with impact is not supported by evidence from other impacted communities.

661 | 9. The study ignores the fact that many police calls contacts and much of their time is taken up by no arrest "calls". These will increase. No impact or mitigation is attributed to them.

Coping Mechanisms:

Coping Mechanisms:

758 | 1. The study omits several areas including the Mental Health Clinic at F. E. Warren AFB, the Awareness House, Cheyenne Housing Authority, Cheyenne Legal Services, the YWCA, and some eight other agencies.

731 | 2. Insufficient attention is paid to transients and the resulting impact that they place on the community.

763 | 3. All funding sources including volunteer services and community donations must be assessed in order to determine dollar amount needed to continue service level.

734 | 4. Again, the study ignores multipliers and the differing nature of the new population from the old when discussing mitigation assistance.

767 | 5. No reference to any prevention programming in the human services area. This is a shortfall.

738 | 6. No mention is made of the bust cycle. This is a common shortfall throughout the entire study.

7. The report includes comments from 12 seperate agencies.

Comments from Tom Bougsty in Methodological Problems/Social Services Assessment:

734 | 1. Mr. Bougsty did a detailed analysis and review of the literature in regard to the human problems in rapid growth communities. His conclusion was, as has been emphasized in many of the other reports from impact teams, that a simple ratio of population increase to demand for services is not adequate. His conclusion was that is possible to quantify, although, somewhat roughly the increased multipliers and factors necessary to compute a more realistic service level not only for Social Service areas but also for Law Enforcement, Recreation, and other areas where there is a disproportionate impact. Hopefully, the methodology of the next WNSIS will take into consideration these issues. If it does not, the document will be seriously in question and its conclusions will be very suspect.

Intergovernmental Impact Team:

370 | 1. The selection of the southside as the location for housing over 60% of the construction workers should be treated as a alternative rather than a given. The choice of this location presents major intergovernmental problems and requires that the governing bodies take a look at other options. The next WNSIS should

370 those alternatives rather than taking the southside as a given.

2. The elected officials need to become familiar with the
322 options available for less high impact housing and what policy decision must be made in order to implement these.

The City of Cheyenne, Wyoming 82001

202

MAYOR
DON ERICKSON
CITY COUNCIL
J. ROBERT STOREY
PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M. P. MARY DEETSCH
WANDA MCCUE
GEORGE SCOTTY REID
RONALD H. ROBBINS

MEMORANDUM

13 November 1983

TO: MAYOR DON ERICKSON

FROM: MICK SNAPP

SUBJECT: Professional WNSIS Evaluation

My personal review and evaluation of the WNSIS Document generally finds it to be completely inadequate. There are a number of problems with the Document at the detail level. However, the major oversights are my primary concern. They are:

36 1) There is a consistent pattern in the document of making methodological or statistical decisions that minimize impact. As in any research document many small decisions must be made, this document evidences a consistent pattern of choosing the least impact option regardless of its merits. For example, the decision not to include the problems of civil disturbance in the need of additional manpower in the Police Department because the consultants could not exactly estimate what level these disturbances would take. It would have been just as logical to assume that the level would be similar to other projects in other communities. This type of approach has been followed consistently throughout the Document.

956 2) The South Cheyenne area is given only cursory treatment. Much more detail is needed, particularly if 60% of the residents are to reside there.

738 1) Again, the Document ignores the bus cycle and the necessary mitigation in order to alleviate this problem. The reason that this is ignored is because of the decision by the Air Force to include on base construction as part of the base line rather than the impact figures thus reducing the bust to a negligable level. I do not agree with this methodological choice, but again it eliminates impact and is consistent
300 with the approach taken throughout the entire Document.

67 4) The Document consistently ignores what I call "lost opportunity cost." If resources are now available to solve an impact problem then no new resources are needed, however, these resources could be used for other purposes ie new programs or improvements if they were not sucked off for impact thus costing the community an opportunity.

5) The Document does not consider the cost of utilization of excess capacity. When certain projects are built they are designed with excess capacity in order to allow for growth. If the MX impact eats up that excess capacity that is a cost to the community.

102 6) The study does not mention, although I would not expect it to, the fact that the impact on the community is making use of existing investments already made in the community. For example, the Air Force does not need to be responsible for updating fire mains and hydrants, even though they are mentioned as a problem in the WNSIS because the City is already doing this and it is not necessary for the Federal Government to assist in construction of Stage II, even though they will use these facilities and the water provided by it. The reason that this argument is important is because whenever the tables are turned the other way, and the current City facilities are short and must be replaced anyway, it is the assumption that none of this cost should be born by the Federal Government. In other words, they are willing to use the existing services and facilities, but they are not willing to help address existing short falls.

246 7) I think everyone agrees the basic impact assumptions included in the Document are best questionable. The population figures and the economic base analysis are not complete. As far as I can tell the D.O.P.A.A. is not a complete Document because no final engineering or design work is not done on major portions of the projects. Therefore, material and manpower estimates are very preliminary.
908 Also the assumption that the majority of the people will live in the South Cheyenne area is highly suspect. If the action of the South Cheyenne Water Board stands, many of the impact analysis and mitigation sections in the WNSIS will be completely out of date and will need to be completely rewritten.

All of these reservations and problems with the Document however does not mean that it does not serve a purpose. The purpose that the WNSIS serves is to highlight the major problem confronting the community and the local elected officials. It appears that without direct and proactive intervention by all the governing bodies, the Air Force, its contractors, congress and the State, the WNSIS scenario placing the majority of the population in the South Cheyenne, is indeed the most likely option. If this is done, all the impacts mentioned in the WNSIS will be exasperated. The housing and infrastructure problems and mitigation costs will be exorbident, somewhere in the neighborhood of $100,000,000.; possibly even higher since there is no guarantee that the population projections are accurate (it is my personal opinion that they are underestimated).

However, if there is a direct proactive approach, including the elected officials, the Air Force, its contractors, and Congress, other options which would reduce impact and reduce cost are indeed viable. Although, they will not appear in their pure form, the mitigation options that I see are:

a) Money.

275 b) Area Dispersion: placing a greater number of the immigrants in other communities around the area, including Wheatland, Burns, Albin, and the Nebraska communities.

359 c) Contractor Supplied Temporary Housing, not just housing, but a complete full service temporary community.

d) Time Dispersion: in this there are a number of options, the most obvious one is to rethink the timing of the road project and the base housing construction projects, and to spread those out over a longer period of time. Perhaps starting the roads
305 early and waiting to start the base housing until later. The second possibility in the time dispersion option is to lengthen the whole period of construction to have all the missiles available at a later date. Both of these actions would require congressional intervention, but are not wholly impossible since they would allow for a more gradual spending pattern.

e) Greater Local Hiring: Much more attention should be given on the part of the Air Force and its contractors to hiring local people to fill even the technical positions provided by the project. I am
284 concerned that if strong contract provisions are not written into the Agreements between the Air Force and its Contractors, the natural action of the contractors will be to bring in furloughee or available employees from other job sites to the community rather than use available residents who could be trained to do these jobs.

Memo to Mayor Don Erickson
Page four

We need to be very strong on this point. As a person with the same background in this area I am certain that special short term training could prepare a large number of our youth for assembly and checkout and other technical jobs. Don't buy the argument without proof

275 f) Contractor Supported Local Dispersion: This option would require contractors to rent existing vacant housing in the City as a set rate, perhaps that established by the National Housing Act, and making that housing available to its employees. This would bring more of these people into the community and protect the market while not causing a gult upon the bust side and not pushing rent above ceilings permitted for subsidized housing for elderly and others.

297 g) Downside Industrial Development: There should be increased effort on the part of the governing bodies and congress and the Department of Defense to locate one or two industrial developments in Cheyenne in order to mitigate the down side cycle. There are a number of Federal contractors who could be persuaded to place factories or facilities in the community to supply MX and other military needs. These facilities could be timed to coincide with the pullout of the MX and provide jobs for trained people remaining in the community.

These are just some observations on the WNSIS Document and its implications for local government and the policy making bodies. I think that it is essential that the governing body and elected officials become much more informed on the problems associated with the basing of the Peacekeeper Missile here and agree upon a strategy which would result in the lowest impact. This strategy must be agreed upon soon in order that further iterations on the WNSIS and other planning documents which will be used as a base for congressional assistance can reflect the policy decisions made by local governments. If these policy decisions are not made there will be a decision made by neglect and it is my firm conviction that this will not be in the best interest of the community,

120

203

...y
...yenne, Wyoming 82001

November 21, 1983

Jim Burger
Andy Bush
1704 Thomes
Cheyenne, Wyoming 82001

Dear Andy:

This letter is in follow up to our recent discussions on standards park acreage, and storage concerns for parks and recreation. Listed below are the figures and facts as they pertain to these categories:

I. PARK ACREAGE COSTS

1181 A. Based on current park division budget, cost per acre is $1900/acre which excludes capital development. With volunteer work being performed on parkways and athletic complexes this figure should be increased by 25%. This would also take into account maintenance for upcoming areas near completion which will increase park acreage figures and maintenance costs next spring and summer. It is also important to point out that initial start up maintenance costs for the first year are more expensive due to equipment needs.

II. STORAGE CONCERNS FOR PARKS AND RECREATION

1182 There is currently less than three thousand square feet of inside storage space for all parks and recreation divisions. Each division should have a minimum of 9,100 square feet to accomodate their needs for maintenance equipment, recreation and pool equipment. In addition to equipment there is a tremendous need for storage of chemicals (fertilizers, weed control) etc., parts and supplies for irrigation, and custodial supplies and paints. These storage needs are not to be confused with shop space needs as they are separate. It is felt that additional impact on parks and recreation as a result of the MX will have a bearing on the above mentioned concerns.

III. ...ave attached minutes from Greater Cheyenne Regional Commission as it ...ertains to park standards.

...ER
...y Bush
...ember 21, 19...

Please do not hesitate in calling me if you have further questions.

Sincerely,

Dave Romero
Director
Parks & Recreation Dept.
...10 W. 7th St.
Cheyenne, Wyoming 82007

DR/dcg

cc: John Barnett-Planning Department
Tom: Curtis-348 W. Hospitality Lane
Suite 300
San Bernadino, California 92415

...UARD MOTION: ...D BY ... SECONDED ... MOTION CARRIED ... NOVEMBER 3, 19...

1. Bob Guntin motioned to adopt the preliminary draft of the ...ater Cheyenne Parks & Recreation Master Plan, ...ject to comments by Commission members and subject to final adoption at a December 1983 meeting. Pauline ...ppitt seconded the motion. Motion carried.

2. Jo Zunker motioned to adopt a standard of six acres of developed park land per 1000 people in Greater Cheyenne, such that approximately half shall be in community parks and half in neighborhood parks. Deficient neighborhoods are to be provided with 3 acres per 1000 people wherever possible. Community Parks should be approximately 1 1/2 miles apart, Neighborhood Parks ... miles apart. Motion seconded by Randy Poumadere. Motion carried.

3. Roberta Robinson motioned to establish minimum areas to be followed wherever possible of 3 acres for neighborhood parks and 40 acres for community parks. Dave Leonard seconded the motion. Motion carried.

4. Bob Guntine motioned that park land be defined as neighborhood and community parks as set forth in the Greater Cheyenne Parks and Recreation Master Plan and excludes special use areas not available for public use and excluding unsuitable land owned by the City. Seconded by Terry Bridwell. Motion carried.

204

The City of Cheyenne, Wyoming 82001

MAYOR
DON ERICKSON

CITY COUNCIL
J. ROBERT STOREY
PRESIDENT
WILLIAM ANDERSON
CAROL F. CLARK
JOAN CLARK
JANE CRAWFORD
M.P. MARY GERTSCH
WANDA McCUE
GEORGE "SCOTTY" REID
RONALD W. ROGERS

MEMORANDUM

DATE: September 29, 1983

TO: Mick Snapp

FROM: Dave Romero, Director Parks & Recreation

RE: WNSES REPORT

The following comments pertain to the WNSES Report. Comments made will be addressed by page number for reference. I would also point out that on September 28, 1983 I met with representatives of U.R.S. Berger to discuss these concerns.

Page 3-97

1221 1. I would like the standard of (5) acres of neighborhood parkland per 1000 population be changed to (6) acres.

Page 3-98, 3-99

1225 1. It is misleading to say the majority of softball and baseball fields are leased by private organizations or associations. The fields leased are: Jr. League (9) fields, and (2) Jr. Babe Ruth fields.

Page 3-100

1224 1. Add Community House. 2,000 sq. ft. This building is located in Lions Park and is used by the community for various social gatherings as well as by the Parks and Recreation Department in their recreational program.

1212 2. South Cheyenne and northeast portion reference is extremely misleading. Define boundar and include a better description of existing condition.

Page 3-101, 3-103, 3-104, 3-[illegible]

1. Table 3.2 9-3 revised with URS on 9-[illegible]

Page 3-114

1216 1. Options shown for additional recreation should reflect short term and long term considerations. I would like to see the Air Force recreational facilities used by the general public on a monthly fee as in the third time this has been requested but nothing written in the reports.

WE HOME OF CHEYENNE FRONTIER DAYS

Memorandum
Mick Snapp
September 29, 1983

(cont'd)

Page 3-115

1226 1. This table 3.2, 9-12 needs to reflect that golf acreage is not included in the standards shown. No reference is made on impact to the golf course facilities or whether they are satisfactory in meeting projected population increases.

Page 3-117

1. Comments on "South Cheyenne" misleading due to lack of definition.

Page 3-120

1. No mention of use of WAFB recreation facilities is an option for consideration.

Page 3-139, 3-160, 3-162, 3-192

990 1. It is assumed that bicycle and pedestrian traffic is a mode of transportation or for recreation is not a problem in the southern portion of the City. I question this especially if temporary housing is built in this area. There is currently a need to improve the bikeway system to CCC and other planned developments to this part of the City.

1075 2. Comment that Village Creek South project is designed as an intense interior bike and pedestrian network is somewhat misleading. This project provides sidewalks not intense bikeways.

1072 3. [illegible]tion is made of the Highway Departments efforts towards bikeways, nor does it reflect recent bike paths constructed by the city as part of the FAU grant. Paths were constructed along Yellowstone Rd., Nationway, and interior portions of Lions Park.

[illegible] Enforcement Section

650 [illegible] impacts as [illegible] placed on park security [illegible] possibility of MX impacts. I [illegible] see some emphasis placed [illegible] should attempt [illegible] the need for additional [illegible] needs within the [illegible] areas.

Page [illegible]

[illegible] have felt the [illegible] [illegible] assessment of recreational [illegible] [illegible] [illegible] [illegible] however [illegible] [illegible] [illegible] [illegible]

MX Impact Study
Page 2

657 will remain that way due to weather deterioration. I don't believe Cheyenne is ready to handle an approximate 2,000 more vehicles on its streets. Our accident rate is bound to increase. Naturally, our enforcement techniques have to increase. We certainly will need to study and change a lot of traffic patterns if we are to handle this increase of automobiles. I feel that no one can accurately say what type of increase we will experience in the area of crime from the impact. We know we will have increases in some areas, and probably can guess as to what areas those will be, but I doubt we could do it with much accuracy.

THE CITY OF

Cheyenne, Wyoming 82001

ROOK ROOKSTOOL CHIEF OF POLICE

Police Department

MEMORANDUM

TO: Mayor Don Erickson
FROM: Chief B. R. Rookstool
SUBJECT: MNSIS Impact Study
DATE: September 30, 1983

Enclosed are the opinions of my staff and myself on the MNSIS Impact Study as it pertains to the Cheyenne Police Department.

Although this report is more realistic than the one we saw concerning the Dense Pack briefing, we feel it has numerous shortcomings regarding its conclusions pertaining to law enforcement.

Area No. 1 - Vehicles Page 3-81, Volume I - MNSIS Report

655 The conclusions arrived at in this section appear not to consider the fact that patrol officers and supervisors sometimes use unmarked vehicles. The Cheyenne Police Department currently has 45 vehicles assigned to it and this should be the base line that is used in determining the number of vehicles that would be needed for additional manpower under the MX impact statement. Using this formula, we would need an additional vehicle for every 2 officers hired, instead of 1 vehicle for every 3.33 officers hired as suggested by the consultant. (See Exhibit #1)

Area No. 2 - Facility Page 3-82, Volume I - MNSIS Report

649 We feel that the space allocation conclusion that the consultant came up with is not even worthy of consideration. One only has to look at our facility to observe that we have offices in the hallway, no training area, no interview rooms, no firearms training area, insufficient locker room space and, probably most important, no interrogation rooms, plus the fact that everyone is crowded. According to the report, we have 13,213 square feet of usable space. Under the recommendations of the consultant, we would need 6,700 square feet of usable space. We feel that this figure is ridiculous. I am enclosing a statement by a local architect, also a former police officer and consultant for the International Chiefs of Police Association. We feel that these figures represent our space needs much better than the MX consultants. (See Exhibits 2 & 3)

Area No. 3 - Manpower Page 3-85, Volume I - MNSIS Report

659 Here again, we only get the report's recommendation regarding the number of additional police officers that would be required to hand le the MX

MNSIS Impact Study
Page 3

659 of the MX project to be inadequate. I don't know how the consultants or the Air Force can ignore the possibility of civil demonstrations resulting from the initiation of this project. We feel that all kinds of data are available concerning civil disturbances which have occurred at Vandenberg Air Force Base, in Kitsap County in Washington State, and at Rocky Flats in Denver, Colorado. One half of one paragraph in the MNSIS Report does not do justice to the concerns of the residents of the city of Cheyenne or law enforcement in this area. Because of the strong possibility of civil demonstrations, we must be able to mobilize and respond immediately. If the United States Air Force would assure us that it would take care of any and all demonstrations, whether they occur on Air Force property or within city limits, then the conclusions that the consultants came to on manpower in the MX impact study would be sufficient. However, we know that the Air Force will not take care of demonstrators within the city; therefore, in our planning we must be capable of handling massive civil demonstrations

Area No. 4 - Crime Increase - Calls for Service Page 3-86, Volume I - MNSIS Report

660 Although I somewhat agree with the consultant that construction workers and skilled workers do not commit a large number of Part I crimes, information which I have obtained from the Evanston, Gillette and Rock Springs Police Departments does show that impact during the years of 1979, 1980 and 1981 due to mineral development, resulted in a large increase in Part I crimes. (See Exhibit #4).

661 In addition, we feel strongly that all of our calls for service will increase tremendously. Law enforcement is in the unique position in which it has to deal with almost all of the social service problems since generally, the first point of contact is with the local law enforcement agency. See Exhibit #5 for a typical example.

653 The fact that law enforcement is a 7-day-a-week, 24-hour-a-day job has to be taken into consideration when you add duties. In order to increase patrol strength by one man per 8 hour shift, 5 additional officers must be hired. We feel that because of the possibility of major civil demonstrations and unemployed people coming into Cheyenne looking for jobs, only 1.7 officers per 1,000 people is unrealistic.

In conclusion, we feel the only way we could handle the impact without hiring numerous police officers is to institute the one-car, one-man program immediately. With the MX impact, this program would be an absolute necessity in order to mobilize and respond to the possibility of massive demonstrations

Enclosures

TO: Chief Byron Rookstool
FROM: Lt. Pat Seals

SPECIAL REPORT

POINT 1.

In paragraph 5 page 3-81 of Volume I of the Wyoming and Nebraska Socioeconomic Impact Study produced by URS-Berger it states "The jail has a total of 6,700 sq ft and, based on the number of bunks, capacity for a total of 69 prisoners." The paragraph goes on to say that since female and juvenile prisoners are separated, that number would be reduced. The actual number it is reduced to is 49 which is in accordance with the American Correctional Association standards.

POINT 2.

In paragraph 5 page 3-82 of Volume I of the Wyoming and Nebraska Socioeconomic Impact Study produced by URS-Berger it states "The initial per-employee space standard for a single-agency facility is 300 sq. ft. For this joint facility, that figure has been lowered to 250 sq. ft to account for the multiple use of certain areas within the facility. That space standard has then been applied to the estimated number of 1992 day shift employees in each agency (59 in the Sheriff's Department and 58 in the Police Department This results in 14,750 sq ft for the Sheriff's Department and 14,500 sq ft for the Police Department for a total of 29,250 sq ft of departmental space. In fact, because of multiple use of certain areas, each Department would have the use of more space than indicated." I assume, by the above, that URS-Berger is saying that the police department only needs 14,500 sq ft to meet its needs in 1992 Presently, the Department is operating at full capacity, with nearly that number of sq ft already being used. This is far below the projected sq ft needed according to Steven R. Polson of Polson Architects, Law Enforcement Specialists, 111 W. Pace Street, Urbana, Illinois. Utilizing his formula published on page 60 of the September 1983 issue of Police Chief magazine, estimated sq ft would be 28,940 This figure was derived from using 220 sq ft per individual staff member as opposed to URS-Berger's 300 sq ft. However, even using their figure of 300 sq ft per individual staff member the total sq ft needed would be 35,400 sq ft.

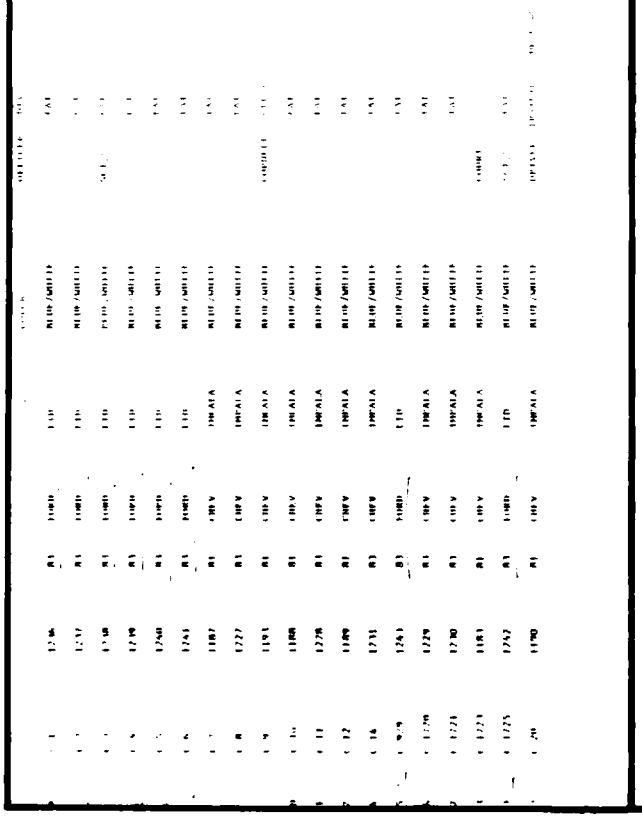
Since there was such a large descrepancy between the projected sq ft needed according to URS-Berger and Mr. Polsons formula, I personally called Mr. Polson in Urbana, Illinois and stated just how I used his formula and arrived at my answer. After listening, he agreed that I had used his formula exactly as it should have been used. We both agreed that the descrepancy probably came from the staff size figure URS-Berger is projecting needed sq ft per individual staff member based on 1992 day shift employees where Polson is using total number of staff members. Mr. Polson has been in the business of planning law enforcement facilities for over a decade and says his formula is based on sound practices and working with over 120 law enforcement agencies in the past which, I believe, would make him an expert in his field. These figures of required sq ft for a new facility are directly reflective of the final cost of a new facility being $4,425,000 according to URS-Berger and $7,437,510 according to Polson.

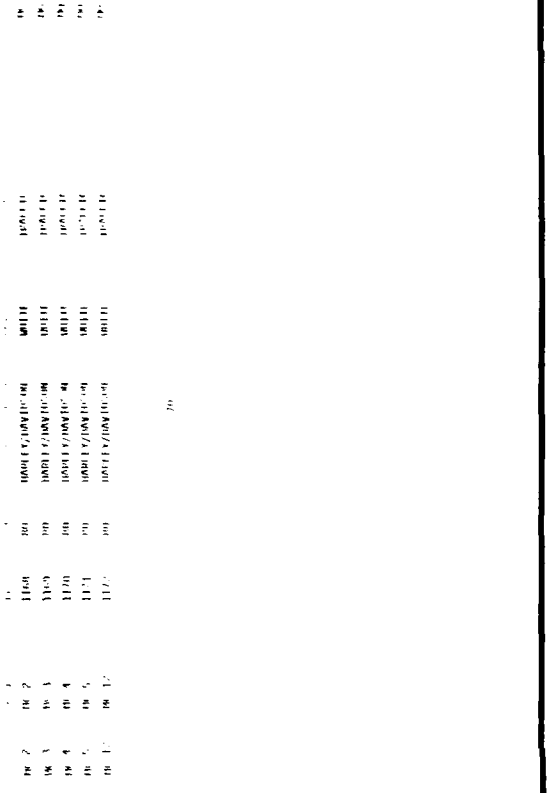
POINT 3.
In paragraph 5 page 3-84 of Volume I of the Wyoming Nebraska Socioeconomic Impact Study produced by URS-Berger it states "The project has one characteristic that makes it different from most other construction projects. It brings with it the possibility of some kind of civil disturbance because of the controversy surrounding deployment of the Peacekeeper missile. The location, duration, size, type, and intensity of any such possible disturbance cannot be predicted at this time."
I believe that such occurance can be predicted within certain limits if adequate research in this area had been done. A good example would be the demonstrations that have occured at Rocky Flats in Colorado, or the protest to the Trident missile in the state of Washington. I believe some kind of base line data could have been generated

POINT 4
In paragraph 4 page 3-84, the report states that "A second source is the special services squad of the Wyoming State Patrol. This group of

specially trained officers can be activated on short notice by the Governor at the request of a local government to assist a local law enforcement agency."
These officers are spread throughout the State of Wyoming and the State of Wyoming has thousands of sq. miles. I cannot see where this "special unit" would be of any use to local law enforcement if they were needed on any kind of short notice. Even flying in an airplane takes 3 to 4 hours to cross the state.

POINT 5.
In the last paragraph of page 3-86 of Vol. I it states "Whether this possibility could require staff increases in addition to those projected are possible but cannot be predicted on the basis of available data." (they are talking about the increased number of unemployed persons coming into the area as the result of construction, URS-Berger is only predicting the number of "jailed" persons that fall into this category that would effect the Police Department. "Jailed" persons are not the only type of persons effecting the operation of the Police Department. Call's for service will increase, to include disturbances where no arrest is made, drunks where no arrest is made, welfare assists where no arrest is made and any other type of public assistance call where these type people are involved.
I do not believe the report takes into account fully, the additional burden that would be placed upon the Police Department in dealing with these transient persons, a large number of which will be requiring services from the various social agencies within our city and count





The Planning Studio, Inc.
Consulting Planning, Design and Economics
Peter L. Iannis AICP
President
1784 Thomas
Cheyenne, Wyoming 82001 (307) 634-7323

9-25-83

Police Facility Review

Assume 330 Sq Ft per staff then Police Space Requirements would = 19,470 Sq. Ft. This figure represents an increase of 4,970 Sq. Ft. An assumption can be made that a Joint Facility would have some common areas which would be shared by both Police and Sheriff Dept's. However, it is equally important to note that the assumption made in the Socioeconomic Impact Study that Joint Space requires 250 is in need of careful evaluation since operational aspects need to be reviewed since both Cheyenne & Laramie County rely on vehicle patrols which originate from a Central Facility & require a concentration of activity at HQ's and this mandates a higher space per staff usage. Present median standards are varied however, 330 Sq Ft per staff appears to be the norm. If we were to reduce per staff space to 300 Sq Ft per staff then we would be at 17,400 still substantially larger than the recommended 14,500. In any event consideration for final space requirements will demand an analysis of programmatic needs, special services and an analysis of manpower projections based on 24 hour

II

of operational policies. As a final note the size of the facility will also be predicated substantially on the location which consequently will determine the final design, i.e. High Rise vs. Large site one story structure.

Poison Architects
Law Enforcement Specialists
113 North Race Street
Urbana, Illinois 61801
Phone 217 384 8877

September 26, 1983

Lt. Patrick Seals
Cheyenne Police Department
1915 Pioneer
Cheyenne, Wyoming 82001

Dear Lt. Seals:

Based on nearly a decade of experience with police departments, it sounds as if protections of your area needs are inadequate. I am unaware of important details but 122 sq. ft. per staff member compares poorly to the national average of 330 for new buildings.

I have enclosed materials that should be useful. Don't hesitate to call again.

Sincerely,

Steven R. Poison

SRP:jrm

cc: Byron Rockstool

enc.

3

CHEYENNE POLICE DEPARTMENT
COST OF NEW FACILITY
Police Department Only

A. Projected Staff size by end of construction period - Summer 1986
118 (92 Commissioned & 26 Civilian)

*These figures are based upon the expected addition of staff personnel as indicated in Vol. 1 of the Wyoming Nebraska Socioeconomic Impact Study completed September 1983. URS Berger.

B. Area Utilizing a Median of 330 sq. ft per staff member 38,940

C. Unit Cost Utilizing a Median of $74.31 per sq. ft. $2,893,631

D. Inflation Rate 1.101 Utilizing an estimated bid date of Nov. 1984 which is 20 months @ ½% per month.

E. Regional Adjustment From the Police Chief Magazine March 1983 Index 1.093

Est. Const. Costs $3,479,010.90 (A x B x C x D x E)

Added Cost Factor 720,164.60 Property, Site Preparation, Consultants Furnishings.

Total Est. Costs $4,199,167.40

73

CHEYENNE POLICE DEPARTMENT
COST OF NEW FACILITY
Joint Police & Sheriff's Office

A. Projected Staff by end of construction period - Summer 1986
Police 118 (92 Commissioned & 26 Civilian
Sheriff 91 (67 Commissioned & 34 Civilian which includes 6 new jailers

*These figures are based upon the expected addition of staff personnel as indicated in Vol. 1 of the Wyoming Nebraska Socioeconomic Impact Study completed September 1983. URS Berger.

B. Area Utilizing a median of 330 sq. ft. per staff member 68,970 sq. ft.

C. Unit Cost Utilizing a Median of $74.31 per sq. ft. $5,125,160.70

D. Inflation Rate 1.101 Utilizing the estimated bid date of Nov. 1984 which is 20 months @ ½% per month

E. Regional Adjustment From the Police Chief Magazine March 1983 Index 1.093

Est. Const. Costs $6,167,380.60 A x B x C x D x E

Added Cost Factor $1,275,603.80 Property, Site Preparation, Consultants Furnishings

TOTAL COSTS $7,437,317.60

74

4

AGENCY	YR	MURD	RAPE	ROBBERY	AGGRAVATED ASSAULT	BURGLARY	LARCENY	AUTO THEFT	INDEX TOTAL	CRIME TOP	CRI
	76	2	4	18	57	898	1,700	168	2,341	44,261	528
	77	0	5	21	82	491	1,815	264	2,668	45,646	584
SPEC.	78	0	14	25	84	509	1,862	197	2,695	47,222	570
	79	3	6	22	86	617	2,510	226	3,269	48,490	674
	80	1	9	44	128	773	2,246	273	3,473	50,704	68
	81	1	12	42	192	936	2,150	207	3,520	52,57	67
	82	5	12	29	186	946	3,414	193	4,783	54,211	696
	76	1	7	27	66	602	2,280	129	3,112	42,959	724
	77	2	19	60	77	768	2,118	149	3,173	44,385	714
CHEYENNE	78	1	17	49	72	577	2,179	139	3,034	44,879	676
	79	5	19	42	52	645	2,181	110	3,052	45,629	670
	80	2	15	28	86	426	2,057	151	2,734	47,207	57
	81	1	13	30	66	482	2,582	102	3,046	48,769	624
	82	2	15	20	60	346	3,612	71	4,116	49,575	830
	76								N/R		
	77								N/R		
HOUSTON	78	0	0	4	0	82	192	44	272	5,724	47
	79	0	1	7	56	73	173	56	366	6,946	61
	80	0	7	6	168	94	589	67	641	6,480	1,00
	81	2	7	4	184	182	470	111	852	7,918	1,07
	82	1	4	6	69	108	422	82	689	11,303	609
	76								N/R		
	77	0	2	2	55	116	466	54	675	9,964	679
LAFAYETTE	78	0	1	11	28	110	485	85	640	10,367	617
	79	1	4	9	41	121	518	70	764	11,206	678
	80	0	7	13	82	178	746	70	1,096	13,125	834
	81	2	5	5	46	183	929	91	1,289	15,143	851
	82	1	4	2	27	161	809	72	1,076	15,536	692
	76								N/R		
	77								N/R		
CHEYENNE	78	3	9	22	119	286	647	144	1,230	18,835	66
	79	3	10	27	151	374	826	172	1,563	19,090	81
	80	5	6	38	292	697	1,340	179	2,255	19,445	1,16
	81	8	14	30	354	804	1,386	150	2,288	20,917	1,07
11/16	82	1	18	34	184	283	1,097	98	1,635	21,873	747

*2nd month analysis

75

5

739 W. [illegible] Dr. [illegible]
Cheyenne, WY [illegible] 8220[illegible]
September [illegible], 1983

Mayor Don Erickson
2101 O'Neil Avenue
Cheyenne, WY [illegible] 8200[illegible]

Dear Mayor Erickson

In regards to the enclosed petition addressing the problem of the Salvation Army providing meals in a residential area, no matter who [illegible] get the very same answer. It's the police.

My initial idea was to call my council women from the ward, Mrs. Jane Crawford. She was very supportive and said she would get back with me. Approximately a month and a half later I called her back. She gave me the answer. It's the police.

My previous renters, Dr. and Mrs. Carroll moved out the first of May due to the constant harassment and [illegible] needs of the people at the Salvation Army. Officers each day and night. After the Carrolls moved out, I had to spend much of my free time there. Need assistance, could see their complaints were real, just real.

Two weeks ago, I called the planning office to see what type of zoning the church was in and explain this problem. It is an R-2 which includes churches. Now, it is not the church going people that are creating the problems. The planning office said I should call Nuisance Control. Therefore, I called the Nuisance Control office and they said I should start a petition. Within a half an hour, they called back to say, forget the petition, they could write a ticket. It's the police.

If my understanding of the law is right, the police must see the person doing something or to be caught in the act. I can not, or me, call the police and tell the person or persons to not do it right there. They are gone. Nor can I run out with a pad and take a picture of the deed. I'm not trying to be humorous, only trying to point out that law enforcement can only do so much. I'm getting tired of the police being everyone's scape goat. The magnitude and some exhibit of this matter should be a matter for yourself and the council. [illegible] people in our property in this area should be protected. After all we pay taxes and vote.

We are now starting to get younger people as in the area. We have [illegible] some of the actions that occur. How is going with [illegible] of my [illegible] or grandchildren were a witness to it. Parents, [illegible] and many [illegible] the [illegible] and to name a couple of [illegible] points.

76

Mayor Don Erickson
September , 1983
Page Number Two

There is no supervision given the people that hang around over there night or day. At night they pull up and sleep in their cars. In fact, some stay for days. There is no number that you can call to get the pastor. It's absurd!

If you walk outside, you hear remarks from them about you or someone else passing by. If there is only one, it's not so bad, but you get two or more and they are very crude.

There are always people in the trash stringing it up and down the alley. I've had a hoe and a shovel out in my back yard in less than an hour. Now have a six foot fence to keep the needy out. People coming the door to use the phone, wanting to use the rest room, wanting to know what future they need, can you give them money, and one even asked where the nearest liquor store was. It's really an ongoing thing, night and day. Now, I ask you frankly, sir, would you like to live in an area where that would you feel safe to leave your wife and children alone?

Another question comes to mind. So many of the same people show up the next week. They drive up in Cheyenne cars. Are these people receiving public assistance? If so, what are they doing with all this time, why you see them working on the church's back porch and the area by the buses?

I'm placed in a very awkward position in asking your help in this matter. Action should be taken before the problem gets worse than it is. I don't want to ruin a good service, but in a more access area, not a residential area. When they had their food service downtown, we never had the problem we now have.

If there is any way you could help push this matter or assist in any committees, please contact me.

Thank you for your assistance.

Sincerely,

Mary Ellen Smith
[illegible] 910 Delwe
Cheyenne, [illegible] 8200

The City of Cheyenne, Wyoming 82001

PUBLIC WORKS DEPARTMENT
2101 O'Neil Avenue

208

MAYOR
DON ERICKSON

CITY COUNCIL
J. ROBERT STOREY, PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M. P. "MARY" GERTSCH
WANDA MCCUE
GEORGE "SCOTTY" REID
RONALD N. ROGERS

MEMORANDUM

To: John Sancanin, Capital Facilities Coordinator

From: Jerry Morse, Director of Street & Alley

Date: October 4, 1983

Subject: WNSIS Comments

Following are my comments on the Solid Waste Disposal and Drainage portions of the Wyoming-Nebraska Socioeconomic Impact Study:

SOLID WASTE DISPOSAL

923 1. Section 3.2.4.1. implies that the Department of Sanitation has the responsibility for collection and disposal of solid waste. In reality, that Department collects while the Street & Alley Division is responsible for disposal. There is no description of the disposal equipment being used.

931 2. Section 3.2.4.3.1 gives some figures for additional solid waste production due to the project. How were these figures arrived at? Were they based on a standard per capita solid waste generation or projection of the City's existing per capita generation or something else?

927 3. In the same Section, the report implies that when we exceed 200 tons per day of solid waste we will need an additional compactor. Where does this figure come from? Is it a standard or value obtained from experience in other communities?

STORM WATER

938 1. Section 3.2.5.1 might indicate that most of the City's storm drain system is above ground and most of the new systems being constructed are also above ground. They might also comment on problems related thereto.

854 2. Section 3.2.5.1 indicates that about 60% of the new housing will be in the South Cheyenne area. Elsewhere in the report, the significant area that is that in the South Cheyenne area are possibly

THE HOME OF CHEYENNE FRONTIER DA

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854 undersized. If the utilities are so bad in that area, is there some way between the City and County that migration to that area can be prohibited? Also, if the utility problems are so great, and developers will be required to eliminate those problems prior to development of the area, will they not find the expenses of that to be extremely high to the point that they may choose to develop other areas of town first?

939 3. Section 3.2.5.4 in describing mitigative measures might again mention the need for an underground storm drain system assuming the consultant feels that need is there.

941 4. In general, I felt the storm drainage analysis presented was quite poor. Telling us the number of equivalent 60 inch storm drains needed to carry flows tells us nothing. We don't know where those pipes should be and, of course, we don't know whether a 60 inch in any one particular location is realistic or even possible. I hope the consultant can be directed to continue the more rigorous analysis used in the downtown area over the rest of the town.

The City of Cheyenne, Wyoming 82001

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2101 O'Neil Avenue

209

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RONALD N. ROGERS

MEMORANDUM

TO: Gary L. Grunkemeyer, Director of Public Works

FROM: Jerry Morse, Director of Street & Alley

DATE: November 8, 1983

SUBJECT: Peacekeeper Draft Environmental Impact Statement

Following are my comments on the MX DEIS. My comments will cover the utilities and transportation segments of the DEIS. I have previously commented on the WNSIS and those memorandums are attached. Some of these comments will overlap the WNSIS comments.

SOLID WASTE DISPOSAL

863 My comments in my October 4, 1983, WNSIS memo have been pretty well responded to. I have some new ones, however. In Section 3.1.7.4.3.2 of the DEIS, the need for accelerated purchase of additional collection and disposal equipment is identified. The section then recommends that the cost of those pieces of equipment be borne by the City by increasing fees to property owners. The DEIS uses the argument that the equipment would need to be purchased anyway and therefore should be borne by the City. The DEIS had found that the need for a packer would be accelerated by three years and the need for a compactor by two years. The typical life expectancy of a packer is two to three years, during which time 95,000 miles is put on a packer. The life expectancy of a compactor is four to five years, during which time 7,000 to 8,000 hours is put on the equipment. In other words, the proposed project will accelerate the need for this equipment by approximately the same length of time as the life of the equipment. Since the project is accelerating the time when the equipment is needed and since the equipment will no longer be usable by the time the equipment would be needed under baseline conditions, it is easy to conclude that the project should be responsible for the entire or almost the entire cost of the required equipment.

STORM WATER

F84 All of my comments in the October 4, 1983, memo regarding WNSIS remain. In addition, I would like to point out the following. In the DEIS Section 3.1.7.4.4.2 claims that the need for two additional storm sewer systems, as a result of the project, is rated as a low impact and not significant. Earlier in Section 3.1.7.3 significant criteria are defined. Since the majority of population is identified to move to the south Cheyenne area, where we know there are major drainage problems existing now, I would have to say that all or almost all of the criteria listed in Section 3.1.7.3 are met by the project and, therefore, the project will result in significant impact regarding drainage.

TRANSPORTATION

989 All of my WNSIS comments still apply. The DEIS at no point seems to mention the effect of the project on the surface condition of roadways. There will be heavy truck traffic from concrete, asphalt and steel suppliers driving to Warren Air Force Base for construction. These routes should be identified as best possible and the DEIS should contain some discussion of their present condition and impact on that condition due to the construction equipment. A further significant comment is that if the housing is to be
1002 other than in the south Cheyenne area, the entire transportation analysis is faulty.

SECTION C

Specific Comments from the Director of Streets & Alleys

In Section 3.2.10.1.1 the sixth paragraph describes County road maintenance. The comment that "thoses roads only maintained by the County and roads under the full jurisdiction of the County" doesn't make any sense to me. Possibly there is something wrong there.

Figure number 3.2.10-6 indicating planned improvements is somewhat incorrect. Prairie Avenue will be 1984. Converse probably will be later than 1985-86. I believe there are some changes in the area of Happy Jack that may have been agreed upon after the data the map was prepared.

On figure number 3.2.10-8 indicating traffic signals, I believe a signal is proposed at Prairie Avenue and Sunset Drive. On Figure 3.2.10-12, the legend has not been completed. In Section 3.2.10.1.2 paragraph 6, the consultant recommends additional study in certain locations. In his statement, he doesn't say what we should look for in the study, merely that circulation seems to be a problem. A little bit more specific comment probably would be appreciated. Also, the first location listed "Missile Drive to Deming Drive" doesn't make sense.

Section number 3.2.10.1.3 explains project impacts. The first paragraph refers to morning peak hour assignments listed on a figure elsewhere in the report. Are these trips based on workers driving to Warren Air Force Base or are they based on all workers, some of which may be destined for other work sites? Also, do they include only workers and might there be trips made by family members of workers that might also create impact? Finally, are there other expected immigrants that will provide services to the project workers and their families that may also be making trips during the peak hour that should be included in the analysis?

Section number 3.2.10.1.3 - Will there be any impact on roadway surface conditions due to the project? I don't mean to insist that there will be, but it would be appropriate for the consultant to mention that there will not be if in fact that is the case.

The consultant should address routes for construction equipment and materials being delivered to construction sites on the Base or to construction sites elsewhere and the effect that those trips will have on the roadway surface.

Figure 3.2.10-19 has the same title as Figure 3.2.10-17, but has different ADT's shown. One or the other should be corrected.

Figure 3.2.10-21 showing estimated peak hour traffic volumes has an apparent error on I-25. South of Happy Jack Road, 760 vehicles per hour are shown while north of Happy Jack Road only 540 are shown, yet there is no interchange at that point for the 220 vehicles to exit.

The WNSIS in general has indicated that in the south Cheyenne area, transportation and utilities are significantly over capacity at this time yet most of the immigrant populations has been assigned in the study to that area. Is there some way the City or County can forbid further development of an area that is known to have significant problems of this nature? If such development is forbidden or if developers find mitigation of the problems too expensive, then many of the assumptions in the WNSIS are invalid.

The City of Cheyenne, Wyoming 82001

PUBLIC WORKS DEPARTMENT
2101 O'Neil Avenue

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M. P. "MARK" GERTSCH
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GEORGE "SCOTTY" REID
RONALD H. ROGERS

MEMORANDUM

To: John Sandahl, Capital Facilities Coordinator

From: Jerry Morse, Director of Street & Alley

Date: October 4, 1983

Subject: WNSIS Comments

Following are my comments on the Solid Waste Disposal and Drainage portions of the Wyoming-Nebraska Socioeconomic Impact Study:

SOLID WASTE DISPOSAL

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3. In the same Section, the report implies that when we exceed 200 tons per day of solid waste we will need an additional compactor. Where does this figure come from? Is it a standard or value obtained from experience in other communities?

STORM WATER

1. Section 3.2.5.1 might indicate that most of the City's storm drain system is above ground and most of the new systems being constructed are also above ground. They might also comment on problems related thereto.

2. Section 3.2.5.3 indicates that about 60% of the new housing will be in the south Cheyenne area. Elsewhere in the report, the consultant has found that utilities in the south Cheyenne area are drastically

undersized. If the utilities are so bad in that area, is there some way between the City and County that migration to that area can be prohibited? Also, if the utility problems are so great, and developers will be required to eliminate those problems prior to development of the area, will they not find the expenses of that to be extremely high to the point that they may choose to develop other areas of town first?

3. Section 3.2.5.4 in describing mitigative measures might again mention the need for an underground storm drain system assuming the consultant feels that need is there.

4. In general, I felt the storm drainage analysis presented was quite poor. Telling us the number of equivalent 60 inch storm drains needed to carry flows tells us nothing. We don't know where those pipes should be and, of course, we don't know whether a 60 inch in any one particular location is realistic or even possible. I hope the consultant can be directed to continue the more rigorous analysis used in the downtown area over the rest of the town.

210

The City of Cheyenne, Wyoming 82001

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JOAN CLARK
JANE CRAWFORD
M. F. MARY SERTSCH
MANCA MCCUE
GEORGE SCOTT, REC
RONALD N. ROGERS

October 4, 1983

To: Mayor Don Erickson

From: Felix Pino - Supt. Sanitation Dept.

Subject: Comments on Peacekeeper Impact Study

925 One sanitation route has been in the planning stage for well over a year. This route should have been initiated by now but due to the economy, I have been holding back on the implementation. The need for this route is yesterday. The second unit would, perhaps, take care of the additional tonnage that the report has predicted. A prime consideration for the '84 budget.

926 Speed up construction of the transfer station. By the time it is completed, it should handle anything over and above the demands predicted by the study.

1047 I am in favor of the extra paving of county roads in connection with this program, especially the ones adjacent to the existing city limits.

98 My general feelings on this report are good, one point for your consideration. I feel most government reports are slightly optimistic, such as the actual impact on Cheyenne. The government does this in order to soften the blow, when it comes much faster than they had anticipated. should the MX become an actuality, in this area, I feel we are going to be in need of most of these improvements on a much more rapid scale than they have anticipated.

I feel that when Congress says 'go', the impact will be now, not 1988, and we had better be prepared.

THE NEWS - CHEYENNE FRONTIER DAYS

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COMMENTS FROM THE CITY TRAFFIC ENGINEER

DRAFT ENVIRONMENTAL IMPACT STATEMENT (OCT 1983)

PEACEKEEPER IN MINUTEMAN SILOS

90TH STRATEGIC MISSILE WING

F.E. WARREN AFB

The Traffic Engineering Department has reviewed the Transportation Sections of the Draft Environmental Impact Statement. We would like to present the following comments:

Section 3.1.9.6 Mitigation Measures (Pg 3-175, 176)

We basically agree that these mitigative measures are required because of the impact caused by the increased traffic on the City street network. We would like, however, to expand on these mitigation measures.

The number one mitigation priority we feel for the City of Cheyenne, as a result of the impact, will be needed improvements to Pershing Boulevard. There are two sections on Pershing Boulevard that will be especially impacted and these include the Randall Avenue interchange and the corridor from Snyder Avenue to Evans Avenue. This is a result of the high reduction in levels of service as discussed on Pages 3-164,165.

The Randall Avenue interchange at I-25 needs to be redesigned and the traffic signalization needs to be upgraded. Traffic signalization would include a new controller that will enable special phasing and overlaps to occur, as well as handle inbound and outbound traffic.

999 As previously stated in the WRSIS Report (1), Section 3.2.10.1.2, improved circulation needs to be set up within the City on the traffic network system. As a result of this, the new traffic signals at Randall Avenue interchange and I-25 need to be interconnected to the new master computer traffic control system that the City is presently installing. This will enable the intersections at I-25 and Randall Avenue to be coordinated with other signalized intersections in the City.

The second location with a priority number one rating is the Pershing Boulevard corridor from Snyder Avenue to Evans Avenue. It is felt that this is a very high priority because at the present time traffic is becoming congested with increasing capacity problems during the peak hours for traffic going to and coming from Warren Air Force Base. Because Pershing Boulevard will be one of the most impacted arterys within the City, the impact will increase the traffic to a point where there will be unacceptable capacity problems with poor levels of service causing jammed traffic conditions at times. Along with this there will be long delays experienced and a large number of stops. Therefore, this corridor on Pershing Boulevard is listed as a number one priority.

We, therefore are requesting mitigation funds from the Air Force to redesign primary intersections and improve signalization from Snyder Avenue to Evans Avenue on Pershing Boulevard. This includes a redesign of geometrics and improved traffic signalization to the point where special turning movements can be set up with more than two phases operating at these intersections. In order to have multi-phasing and overlaps at each one of these intersections, the controllers will also have to be upgraded so that more than two phases will be permitted. Because the impact makes it necessary to improve circulation, traffic signals on Pershing Boulevard need to be interfaced and interconnected with the master computer being installed downtown.

As part of the request for mitigation funds, money would be used to help develop the interconnection system from one signal to another and to the downtown Computerized Master Controller. Funds would also be used to develop new timing plans for Pershing Boulevard and the central area for Cheyenne because of traffic movement changes.

There is one more section on Pershing Boulevard that will be impacted. It is the intersection of Logan Avenue and Pershing Boulevard. It is felt that this complex intersection will be impacted and mitigation through improved traffic signalization is required. This signalized intersection also needs to be interconnected to the downtown master control computer.

999 There are several other high priority areas which we feel will be significantly impacted with needed improvements. Most of these are listed in the mitigation measures section and some are not. The first area is a corridor on Lincolnway from Snyder Avenue to Missile Drive with special emphasis on the Deming/Ames intersection. Included with this corridor is the intersection of Missile Drive and 19th Street/Happy Jack Road. We feel this intersection will be heavily impacted. We are, therefore, recommending that this be a high priority for funds including improved geometrics and signalization at the intersections of Ames, Deming and Lincolnway and at Missile Drive, 19th Street/Happy Jack Road. We feel that new traffic signals will be required at Missile Drive and 19th Street/Happy Jack Road because of the proximity of this intersection to a major Warren Air Force Base access. Missile Drive will be a major connector to the Base from the downtown area with heavy volumes of traffic using this artery. At the intersection of Missile Drive and 19th Street/Happy Jack Road, traffic has been increasing. In addition, accidents have been increasing to the point where traffic signals will be warranted in the future. With the increased traffic anticipated because of the peacekeeper missile on Missile Drive, it is felt that the accidents will increase even more at this intersection of Missile Drive and 19th Street/Happy Jack Road to the point where traffic signals will be required.

One location with a very high priority is the interchange of I-25 and College Drive. As stated in the report, level of service will drop from an A-level service down to a D or an F, which is an unacceptable level of service. Therefore, mitigation is required at this interchange, including improved geometrics and possible signalization.

As listed on Pages 3-164, 165 as having significant impacts with recommended mitigations (Pg 3-176) are the corridors of Logan Avenue from Pershing Boulevard to Lincolnway and the Randall Avenue corridor (I-25 to Pioneer Avenue).

999

We agree that these areas will be impacted and that mitigation is needed. The intersection at Logan and Lincolnway will be especially a problem because of the high volumes that run through this intersection at the present time. With additional traffic from the impact, improved geometrics, special phasing and turning movements will be required. This includes the installation of left turn lights and left turn phases. This will also be the case at 19th and Logan and 20th and Logan. Special turning movement phases will be required because of the increased traffic. The intersection of Snyder Avenue and Randall Avenue will especially require improved geometrics, channalization, as well as improved signalization. We are, therefore, requesting funds for the above projects that have been identified as capital intensive (Pg 3-176) and needing mitigation.

Section 3.1.9.4.5 Pedestrian and Bicycle Facilities (Pg 3-172)

Another high priority area in which funds are requested is in the school safety and pedestrian safety area. It is felt that because of the impact, additional crosswalks, signing, marking and traffic control will be required especially where children are walking to and from school. We feel that funds should be set aside to develop plans for safe walking routes for children, as well as setting up crosswalks, signs and other traffic control.

The peacekeeper missile will also impact the City of Cheyenne's bikeway and bikepaths. We feel that funds need to be set aside for additional signs and markings to aid the bicyclist when going from the residential areas to recreation areas. This will include signs, pavement markings and other traffic control, as well as planning new bike routes and bike paths. Some additional bike paths and bike routes will need to be set up.

Section 3.1.9.4.4 Public Transit (Pg 3-171)

1020

It is unknown if the DEIS included shopping trips, recreational trips, etc., when considering the need for additional public transit. It is a feeling of the Traffic Engineering Department that transit needs to be considered for shopping and recreational purposes. This would be for construction worker family members that would be living in residential areas and making trips to shopping centers, parks and other areas. We, therefore, recommend that funds be set aside to make additional studies about public transit for not only work related trips, but also non-work related trips.

212

DEPARTMENTAL CORRESPONDENCE

Date 10-5-83

Subject: A-95's

To: MAYORS OFFICE Dept:

From: BOB LEE Dept: CPC

with a very cursory perusal. I felt the reports were a little heavy with superfluous detail but the mitigative measures stated were useful. For the most part they were based on common sense but were enlightening for me in the critical areas of water supply, drainage, sewerage, and capital facilities needs.

807

As the project pertains to my operation, I still feel the only discernible method at this time to calculate any increase in necessary monies is to correlate, via percentage, the upward population numbers with existent funds. For instance, if the population increase reached 10% then a probable subsequent increase of 10% would likely be necessary to maintain current services.

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The City of Cheyenne, Wyoming 82001

MAYOR
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WANDA HOUSE
GEORGE SCOTT, MD
RONALD N. ROGERS

TO: Mayor Don Erickson

FROM: Ronn Jeffrey

DATE: October 7, 1983

RE: Department of the Air Force Socioeconomic Impact Study, Volume I

After reviewing the study, I would like to address some concerns I have with Section 3.10.1.4 a. - Youth Alternatives

1 Section 3.10.1.4.6.1 - Baseline Description presents some misleading information. Specifically:

768

a. The first paragraph on page 3-287 concerns referrals into the program. It should be clarified that the figures presented are percentages, not actual numbers.

750

b. Paragraph two, page 3-287. The last sentence is incorrect. The volunteer component of the program has been a priority since the program's inception.

765

c. Paragraph three, page 3-287. The first sentence implies that our program is without any current needs. This statement is misleading. Although we receive a lot of support and feel our program operates at a high level, there remain current unmet needs in areas of staffing, training, equipment, and the like.

750

d. Paragraph one, page 3-288. The Youth Alternatives staff is not eight but ten persons (9.5 FTE), including four full-time counselors, one part-time counselor, one director, one assistant director, one volunteer coordinator, one office manager, and one clerk/typist.

This would also affect a change on Table 3.10.1-11, page 3-289, Projected Baseline Staff Requirements.

757

e. Paragraph two, page 3-288. Although we agree with the comments in this paragraph, it is important to note that expansion into the basement will require considerable renovation at great expense.

The City of Cheyenne, Wyoming 82001

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753

2 As the study accurately indicates in Section 3.10.1.4.6.1 and Section 3.10.1.4.6.3, we are presently experiencing a heavy work load. We estimate that we are 1.5 staff persons short at present. The present overload places considerable stress on the staff to maintain high quality service.

With projected impacts, this stress will be intensified, a fact affecting the staff's capacity to provide quality services. The dilemma is that the report indicates maintaining or increasing the level of stress on the staff is satisfactory.

764

3 Studies in New Mexico, Colorado, and Wyoming have attested to the numerous problems young people incur as a direct result of impact. Another major concern is that the mathematics formulas used in terms of determining future impact on our office do not reflect any of the types and degrees of these problems that will be felt by the citizens of this county and that we, individually as an organization and collectively as local service providers will face.

4 A direct concern noticeably apparent from this report is that the county's client referral process and services provided by our office are not static. Rather, these processes are in constant flux, and the impact on our office is ever changing in terms not only of client numbers but client needs.

A very direct concern to our office is that historically young people facing change or transition in their environment frequently become involved in crisis situations. Our office anticipates that our involvement in this situation will be multiple and with the impact of changes reflected upon our youth with the military presence and that this is not reflected in the reports and it affects our office and other social service providers.

Ronn

214

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-364

215

November 23, 1983

Honorable Don Erickson
Mayor of the City of Cheyenne
The Municipal Building
Cheyenne, Wyoming

Re: Comments by the Coping Mechanisms Subcommittee on the Draft Environmental Impact Statement of the Department of the Air Force, Dated October, 1983.

Dear Mayor Erickson:

Thank you for the opportunity to study the DEIS and to submit our comments. Attached hereto are the comments of the Coping Mechanisms Subcommittee. We trust that we have addressed the issues and our concerns in a clear and reasonable manner.

Sincerely,

Ellen Crowley

Ellen Crowley, Chairman
Coping Mechanisms Subcommittee
of the Impact Team.

EC:es
Enclosure

REPORT TO MAYOR DON ERICKSON

by the

COPING MECHANISMS SUBCOMMITTEE OF THE MX IMPACT TEAM

on the

DRAFT ENVIRONMENTAL IMPACT STATEMENT OF THE DEPARTMENT OF THE AIR FORCE, October,1983

November 23, 1983

COMMENTS BY THE COPING MECHANISMS SUBCOMMITTEE ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT OF THE DEPARTMENT OF THE AIR FORCE, October, 1983

Part 2.0 AFFECTED ENVIRONMENT

The Draft Environmental Impact Statement (DEIS) dated October, 1983 appears to be a distinct contribution to informing the public of subject areas, issues, and concerns about which it has been asking questions. We refer to the description of existing environmental conditions, an analysis of employment demand, the delineation of the Region of Influence and the Areas of Concentrated Study. (Pages 2-1 et seq.)

209 QUESTION: Given the basis of the 60-mile radius surrounding F. E. Warren AFB to delineate the Region of Influence, why was the radius extended into the Denver metropolitan area? Your Figure No. 2.1.1-1 on Page 2-2 shows clearly that Denver is 100 miles from F.E. Warren AFB.

It is gratifying to note that the sources of data included the Coping Mechanisms Subcommittee and the Heritage, Values, and Well-Being Subcommittee of the Mayor's Task Force. (Page 2-16). In Section 2.1.5.1.2.2 on Page 2-16, there is the statement that "interviews were conducted with local residents" as one of the methods used to analyze existing conditions with respect to Social Well being existing conditions. That broad reference leads to a request for elucidation.

470 QUESTION: How many interviews were conducted? When and where did they take place: door to door? street corners? concentrated gathering places such as the malls? And who has the results of the interviews and who collated them?

We recognize the excerpts from the Heritage, Values and Well-Being Subcommittee Report. (Page 2-17) Those issues and concerns are shared by the Coping Mechanisms Subcommittee loking toward the MX impact:

Transients and indigents
Absorbing newcomers
Hiring local labor
Substance abuse/alcoholism
Mental Health needs
Crime levels
A lack of community spirit
Changes in lifestyle
Unwanted teenage pregnancies
Personal safety
Dealing with social change
A clear vision of future
Impacts of inflation, and
Changes in the local way of life

The analysis of the human services portion of the DEIS (Pages 2-26 through 2-28) follows closely the Wyoming Nebraska Socioeconomic Impact Study (WNSIS) at pages 3-268 through 3-307, and suffers from the same omissions. The eight additional providers which will be analyzed and described and added to the WNSIS report should also be included in the FEIS, namely:

570

Awareness House
Cheyenne Housing Authority
Greenhouse
Legal Services of Laramie County
Needs, Inc., including Volunteer Information Center.Volunteer Action Center
Project Hope
Wyoming Food Clearinghouse
YWCA Rape Crisis Center and Cottonwood Y

As stated at pagem 2-1 in the Coping Mechanisms Sub-Committee October 5, 1983 Critique of the WNSIS, there is no doubt that the services offered by the agencies listed above will be in demand in an impact situation with its boom and bust cycles. That impact and demand should be recognized and evaluated.

Part 3.0 ENVIRONMENTAL CONSEQUENCES, MITIGATION MEASURES AND UNAVOIDABLE IMPACTS.

It is fortunate that an explanation was given on Page 3-1 concerning "Significant Impact", that is, impacts which "warrant heightened attention by the Air Force or others during project planning, or the extent of the action necessary to avoid that impact."

The Coping Mechanisms Subcommittee finds that definition difficult to understand: to keep it in mind requires tenacious review of Page 3-1. For example, in Figure 3.0-1 on Page 3-3, "Social Well-Being" is reported as "Moderate Significant Adverse Impacts with Potential Beneficial Effects"

471

QUESTION: It the correct translation as follows: 'Social Well-Being will warrant moderately heightened attention or moderate action to avoid impact'?

If so, as a practical matter, what is being said? What, actually, are the short and long term impacts? What are the potential beneficial effects?

The answers may be on Pages 3-83 and 3-84 and on Pages 3-109 and 3-110, but they require and merit cross references and clarification.

3.1.5.6 Mitigation Measures

The Coping Mechanisms Subcommittee concurs with the Mitigation Measures listed on Page 3-90. We, too, put at the head of the list the "media program for discouraging surplus job seekers from out of the region". We urge that such a program begin immediately, and that it be nation-wide.

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A variety of factors contribute to Cheyenne's popularity as a "stopping ground" for transient persons in southeastern Wyoming. Located on Interstates 25 and 80, Cheyenne is the "port of entry" for southeastern Wyoming and stands as a midpoint among neighboring metropolitan areas. Cheyenne's reputation as a railroad town also serves to attract those

people who are out of work. The MX may act as a welcome mat of sorts for even more transients.

Dave Marshall of Wyoming Job Service testified that there are 17 job applicants for each job opening. DPASS representatives have found that only 50% of transient applicants are sincere in their search for employment. The other 50% of the transient applicants are "riding the system": that is, they blame the energy boom and subsequent bust, or the Greyhound strike, crop failures and even the eruption of Mount St. Helens for their inability to secure employment. What they are really seeking is to secure free food, shelter and transportation before they drift on.

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The Coping Mechanisms Subcommittee applauds the many references in the DEIS to coordination of measures, a coordinating center, needs assessment, information and referral, and monitoring programs. The monitoring programs should address specifically goals, methods and cability (including financial ability) to respond.

The fourth mitigation measure listed on Page 3-90, namely

472

"The utilization of an information, coordination center that performs job referrals, develops social integration programs for new and existing residents and distributes printed information"

appears to be the first level, that is the service level by the Center. The last mitigation measure listed on Page 3-90 appears to be the level where providers coordinate what services are being given for comprehensiveness:

"Creation of an information and coordination program..."

If this is not the correct construction, the meaning should be made more explicit.

The Coping Mechanisms Subcommittee agrees with the recommendation for "A needs assessment of social well-being qualities and problems throughout the community..." as a mitigation measure. (Page 3-90) Problems for local residents such as alcohol and drug abuse, domestic violence, mental health problems, family and youth distress, and disruptions of social, political and service agencies can be predicted from other boom and bust experiences. These areas need to be measured and monitored in the Laramie County environment. Standardized data collected directly from adults and children need to be gathered during the various stages of the MX impacts. Since these predictable impacts on residents were not directly assessed in the Environmental Impact Statement process, then assurance of financial support for local jurisdictions to collect necessary baseline and monitoring data directly from residents seems essential.

563

The Committee members noted with interest the novel suggestion for "provision of transportation from drinking establishments for intoxicated patrons..." (Page 3-90 If that statement is not of a facetious tone, the Committee responds without equivocation that such a service would have to be paid for by the users of that service and it would have to be of a volunteer nature.

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The seventh and ninth potential mitigation measures listed on Page 3-90 appear to be consonant with the Coping Mechanism's recommendation on page 12 of its Community Profile report dated August 31, 1983, namely:

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"Promote COMMUNITY COMPETENCY . . by PLANNING COORDINATION

1. MAYOR'S IMPACT TEAM. The continuation of this group of concerned leaders in the community is essential to the planning process.
2. HUMAN SERVICES COUNCIL. Form a council composed of citizens at large, professionals, and experts to coordinate the human service delivery system in Cheyenne and to mastermind the execution of the planning. * * *"

475

In order to avoid expensive and unnecessary human problems throughout the MX boom and bust periods, it is essential

that extensive and well-planned prevention programs be developed. The Coping Mechanisms Subcommittee Profile Report of August 31, 1983 expressed at Pages 16-17 the role of the Human Services Council as follows:

> "Leadership and control over impact needs and problems would be effectively attained by the creation of a Human Services Council. The Council should be county-wide. It should be composed of public and private human services providers, specialists, experts, professionals and citizens at large. The Air Force should be invited to be represented on the Council. Every Council member must be totally committed to exert his and her efforts to plan for and to do what is best for the City of Cheyenne before, during and after the MX impact. The recommended tasks of the Council are, at least, to

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> 1. Coordinate the delivery of human services in Cheyenne;
>
> 2. Manage the planning for impact related programs;
>
> 3. Determine the increase or decrease or change in caseloads imposed upon the human services providers; and
>
> 4. Evaluate increasing demands for additional services and for higher quality services due to the MX impact.
>
> The Council should be authorized to oversee impact-related problems, preventions and remedies."

To the foregoing authority of the Council, the Subcommittee adds that it should have significant control over funding decisions.

476 The fourth mitigation measure listed on Page 3-90 of the DEIS should be accorded great importance, namely:

> "The utilization of an information/coordination center that performs job referrals, develops social integration programs for new and existing residents, and distributes printed information..."

That Information Coordination Center could be established by the Human Services Council as a Human Services Center. It should be established in a central location in Cheyenne to coordinate service delivery to newcomers and transients and to long time residents during the MX impacts. This center could provide services critical to newcomers and reduce disruptions to the long time residents and to the existing human services agencies. Such services could include:

(a) JOB REFERRAL INFORMATION from all contractors and subcontractors;

476 (b) Food, shelter and other aid information for TRANSIENTS;

(c) COMMUNITY INFORMATION AND REFERRAL services of local services, activities and cultural heritage;

(d) COORDINATED EMERGENCY SERVICES delivered by outreach workers from law enforcement, mental health, social services, legal services and others to effectively assist and contain crisis situations;

(e) PREVENTION SPECIALISTS who could provide educational materials on such topics as money management, stress management, parenting, conflict resolution, and other pertinent topics in order to prevent more costly problems from developing among individuals affected by the MX impacts.

Many of these programs currently exist in individual agencies, such as Job Services, Comea, Volunteer Information, Volunteer Action Center, Helpline, Community Action of Laramie County. Efforts coordinated among these agencies would prove to be cost-effective as well as provide a more comprehensive delivery system for the listed services. Currently there are no mechanisms existing to do this needed coordination.

The third potential mitigation measure listed on Page 3-90 merits expansion. That measure reads as follows:

> "Creation of an educational program dealing with the problems of family violence and the support of existing services to deal with these problems..."

477 The schools and the media can provide prevention education on the problems common to impact towns, that is, alcohol and drug abuse, problems with children, stress and mental health problems, crime, family violence, disruptions of neighborhoods, work settings, schools and churches. A comprehensive K-12 program in the schools would be best to prevent problems for children. Self-esteem building and social skills development in addition to skill development in decision-making, communications, conflict resolution, anger control, stress management, parenting issues, and drug/alcohol education would be valuable for the children situated in impact situations due to the MX impact.

The Coping Mechanisms Subcommittee RECOMMENDS other significant mitigation measures:

235 1. JOB TRAINING FOR LOCAL RESIDENTS should be initiated as soon as possible to assure maximal local hiring in order to minimize MX impacts.

571 2. STAFF DEVELOPMENT within and between human services agencies would better prepare providers to cooperate and effectively handle changing community needs.

572 3. VOLUNTEER SERVICES should be increased, encouraged and utilized. The contributions and efforts of both long-term residents and new residents should be solicited and welcomed.

88 4. AN EMERGENCY FUND should be made available to be quickly accessed to prevent or minimize the development of problems before they get out of control and costly at a later date. This money should be tied to the monitoring programs available for human service needs and should be immediately responsive to identified needs.

573 5. A MECHANISM TO ASSIST NEWCOMER INTEGRATION in the community is needed. This would prevent the "we-they" split and allow newcomers to become acquainted and adaptable to local customs and society. A means to identify the newcomers and access them with programs such as welcome wagons is important. This could be carried out with coordination between local human service agencies and the newcomer's work place on an on-going basis as they arrive in Laramie County.

There are significant references at Page 3-119 to "unmet, but unmeasured, demand" for human services. The conclusion appears to be that "human service agencies operating at capacity which cannot expand institutionally in response to increases in demand may be indicative of a need for additional support for human services in the community". The Committee has had a difficult time trying to interpret those references.

512 QUESTION: What is that paragraph saying? Is it saying that there are no projections for federal, state or local funding and therefore the volunteer private organizations in Laramie County should rise to the occasion and support its human services programs to the extent that they may be needed?

Is this a follow up on the (applicable/inapplicable) analogy on Page 3-86 which states that "Residents of the city and the county annually demonstrate their ability to successfully carry out a major effort by planning for and running Frontier Days. The same spirit and effort, transferred to planning for and dealing with project impacts, could enhance social well-being conditions in the future."

It must be recognized that the Frontier Days Committee is made up of interested, dedicated business men who work many long hours planning and executing the Frontier Days show. It must be recognized, also that Frontier Days is a money making venture, not just a hobby or charitable enterprise.

DEIS October, 1983
Coping Mechanisms Subcommittee Page 10.

The Coping Mechanisms Subcommittee submits that the mitigation measures for human services which are presented for consideration on Page 3-123 are extremely important. We ask

513

> Are those measures looking not only to the professional people in the human services arena, but also to interested citizens with decision and policy making capabilities.

The Committee refers specifically to the recommended institution of a "cooperative monitoring program" and a method for "an evaluation of impacts".

Those recommendations should be implemented in the Final Environmental Impact Statement.

Again, thank you Mr. Mayor, for permitting the Coping Mechanisms Subcommittee to submit to you its comments on the DEIS dated October, 1983. We think that that statement is strong in many respects and with clarifications and expansion, it should reflect the environmental impact of the MX deployment in Laramie County, Wyoming.

Respectfully Submitted,

THE COPING MECHANISMS SUBCOMMITTEE
OF THE MAYOR'S IMPACT TEAM

By: Ellen Crowley
Ellen Crowley, Chairman

ELLEN CROWLEY
Attorney at Law

SUITE 11 CITIZEN BUILDING
POST OFFICE BOX 1
CHEYENNE, WYOMING 82001
TELEPHONE 307-634-7955

October 5, 1983
Hand-delivered

Honorable Don Erickson
Mayor of the City of Cheyenne
Municipal Building
Cheyenne, Wyoming

Re: The Coping Mechanisms Sub-Committee Critique of the "Wyoming and Nebraska Socio-economic Impact Study", September 1983.

Dear Mayor Erickson:

Thank you for making the captioned study available to the Coping Mechanisms Subcommittee of the MX Impact Team. We photocopied excerpts from the study and hand-delivered them to the human services providers listed on Appendix "A-1" attached hereto and made a part hereof by this reference. My cover letter requested responses and invited the providers to meet with the subcommittee (see Appendix "A-1").

Some of the human services providers submitted their written comments which are included in this report in the appropriate places. The Subcommittee examined the Study very closely and our comments are included in the enclosed Report.

We appreciate your interest in and concern for, the effect of the MX impact on the delivery of human services in Cheyenne. If we can be of further assistance to you in this important project we shall be glad to contribute our efforts and the expertise of the members of the Coping Mechanisms Subcommittee.

Sincerely,

Ellen Crowley
Chairman, Coping Mechanisms
Subcommittee of the MX Impact
Team

EC:ec

COPING MECHANISMS SUBCOMMITTEE OF MX IMPACT TEAM

Ellen Crowley, Chairman

Marie Baptist Earline Long, Needs, Inc.

Sandy Boyer, Psychometrist, School District # 1

Jack Brourink, Executive Secretary, United Way of Laramie County

Jerry Brown/Dave Marshall, Job Services

Tim Daly, Outreach Director, Community Action

Marja Fahrenhorst, Director of Nursing Services
Cheyenne City-Laramie County Health Unit

James Lucera, Assistant Director, Youth Alternatives

Ralph McConahy, Director, Laramie County DPASS

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September 27,

MEMORANDUM TO: Human Services Providers

FROM: Ellen Crowley, Chairman, Coping Mechanisms Sub-Committee on the MX Impact

RE: Department of the Air Force Socioeconomic Impact Study, Volume I.

Enclosed to each of you is an excerpt from the captioned study that relates to your subject area. We will appreciate it if you will read it very carefully as our Committee relies heavily on the experts in the service areas.

We are required to have a written comment and critique in the Mayor's office by October 5. For this reason, we are hand delivering these excerpts to each service area to give you time to study the report, analyze it and comment on it.

We have been asked to prepare:

1. Specific comments within issue areas most concerned with additional or other gaps;
2. General comments concerning coordination (i.e. overlapping or incomplete areas), whether substantive or otherwise; and
3. The Long Range Community Aspects of the report as it affects your subject area.

We invite you - really, we request - that you attend our Committee meeting on Monday, October 3, 1983 about 12:15 in the Hathaway Cafeteria and bring with you your written comments so we may incorporate them into a general Committee report to the Mayor by October 5, 1983. They always give us so much time to do such a big job!

Your assistance and input will be deeply appreciated.

APPENDIX "A-27"

The Coping Mechanisms Subcommittee delivered the pertinent excerpts from the Air Force Socioeconomic Impact Study to the following human services providers:

ALCOHOLIC RECEIVING CENTER AND HALFWAY HOUSE Pages 271-73.

ATTENTION HOME Pages 304-307.

COMEA SHELTER Pages 281-282

COMMUNITY ACTION Pages 297-300.

COMMUNITY CENTER ON DOMESTIC VIOLENCE Pages 293-97

LARAMIE COUNTY DSS Pages 303-304

PATHFINDER Pages 274-275

PUBLIC HEALTH DEPARTMENT Pages 310-311

SALVATION ARMY Pages 281-287

SOUTHEAST WYOMING MENTAL HEALTH CENTER Pages 287-293

SPRIG LEARNING CENTER Pages 305-306

YOUTH ALTERNATIVES Pages 287-290

REPORT TO MAYOR DON ERICKSON

by the

COPING MECHANISMS SUBCOMMITTEE OF THE MX IMPACT TEAM

Critique of Volume I, Pages I-101 to I-111 and Pages I-261 to I-317 of the Department of the Air Force Socioeconomic Impact Study, September 1981, with respect to the delivery of Human Services in Laramie County, Wyoming.

The Department of the Air Force is to be commended for obtaining data for this comprehensive Socioeconomic Impact Study, covering Wyoming and Nebraska. The format is particularly useful for individual and team work study in specific areas of interest and endeavor. The inventories of Human Services at Pages I-271 and I-291 are extremely useful.

The Coping Mechanisms Subcommittee of the MX Impact Team submits its critique on the assumption that the Air Force, your office, Governor Herschler's Office and the Department of the Air Force is accuracy and thoroughness. References are to the pages in Volume I of the Socioeconomic Study related to human services in Laramie County with particular attention to those services available at F.E. Warren Air Force Base and Cheyenne.

I. General Observations

A. Omissions.

The omission of a detailed description of the Mental Health Clinic at F.E. Warren Air Force Base is not only unfortunate but also a major defect in this part. It is listed on the inventory at page I-291, it deserves detailed attention and description.

RECOMMENDATION:

758 The Coping Mechanisms Subcommittee recommends that the Socioeconomic Study include the Base Line description, Projected Baseline, Project Impacts, and Mitigative Measures with respect to the important, necessary and effective services rendered by the F.E. Warren Mental Health Clinic. This appears to be an imperative addition to the study.

The same drawback appears in the part on human services in Cheyenne. Of the services listed in the Inventory of Human Services in Laramie County beginning on Page I-291, the eleven (11) services were analyzed by detailed descriptions, Fifty (5) services were not described, and none of the fourteen (14) human services for the elderly received detailed attention.

758 RECOMMENDATION:

The Subcommittee recommends that detailed descriptions of at least the following services be added to the Socioeconomic Study:

A. American Red Cross

B. Awareness House

C. Cheyenne Housing Authority

D. Greenhouse

E. Laramie County Agriculture Extension Unit

5. Legal Services of Laramie County
7. Meadowlark House
8. Needs, Inc.
9. Project Hope
10. YWCA Rape Crisis Center
11. Volunteer Information Center
Volunteer Action Center
12. Wyoming Food Clearinghouse

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Without doubt the services listed above will be in demand in an impact situation. That impact and demand should be evaluated.

Omitted from the inventory of human services in Laramie County is the Developmental Disabilities Protection and Advocacy System.

RECOMMENDATION:

The Joint Mechanisms Subcommittee recommends that a conference be arranged with Jeanne Haskin, Director of the Human Rights Unit, Division of Developmental Disabilities, Wyoming Department of Health and Social Services, to discuss the needs of the Developmental Disabilities Protection and Advocacy System in Laramie County.

[illegible]

752

[illegible] Safehouse. Page [illegible] Summary [illegible] Violence and Grandma's Safehouse. Page [illegible] Page [illegible] Youth Alternatives, Inc. Page [illegible]

The use of volunteers for the delivery of human services must be considered as an important element in [illegible] the VA Impact.

[illegible] Treatments:

There is a definite interest among the members of the Joint Mechanisms Subcommittee concerning the delivery of [illegible] residential [illegible] treatment and [illegible]. The following comment has been made by the Director of the Shelter:

> "The Board and Staff of the Jomes Shelter are always interested in the ideas of professionals in the community concerning the [illegible] of the Shelter. We feel that [illegible] concerning the [illegible] of the Shelter [illegible] the [illegible] of the Shelter [illegible] would like to [illegible] [illegible] [illegible]

"The approach to deal with actual future needs for mental health and alcohol programs is development of a short term monitoring program that would be immediately responsive to increased demands under project conditions."

RECOMMENDATION:

728 The Coping Mechanisms Subcommittee recommends that a monitoring program of not only services but of needs be included in each one of the descriptions contained in the Study.

Substantive Issues:

a. Qualitative Aspects

723 The Study does not contain any qualitative aspects of the MX impact on human services. The projections should not be based on, in case...like population growth. Such a basis does not allow for any other problems that will be significant. For example, the military personnel and families, the construction workers, the indian workers all bring with them a separate set of problems which are unique to each classification.

It is imperative to address the qualitative aspects which will be experienced by the Alcohol Receiving [illegible] Battered Women, Detainment, Grandma's Defendse, YWCA Rape Crisis Center, Public Health and Social Services (to name a few).

(2) The Bust

738 It will come. It will require certain cutbacks and certain increased and different services. It was not addressed in the Study. This is a serious gap.

(3) Prevention Programming

767 There is no reference in the Study to a program focusing on prevention of problems. This question should be asked and answered:

"How does prevention programming affect services in the boom and bust phases as far as the public of services is affected?"

4 Short falls

719 No consideration was given in the Study to the gaps and short falls in the agencies and in the services. In some instances projections were based on services already [illegible] at maximum capacity and on facilities already [illegible] and in staff already [illegible].

b. Impact Area

765 No recommendation was made in the Study to the [illegible]

760 [illegible]

760 is to include baseline data on residents' needs.

b. Utilization of Applicable or Affected Agencies

1. Department of Public Assistance and Social Services Pages [illegible]

Attached hereto and made a part hereof is [illegible] reference are the written comments of Ralph [illegible] McClaran, Deputy Manager of DPASS

2. Pathfinder Pages [illegible]

A [illegible] there should be made [illegible] of the statement [illegible] of Pathfinder's quoted [illegible] from state-allocated funds. The state is precluded from funding religious organizations. The proper statement is the funding was actually from and by contracts with a certain state agency for the purchase of services.

720 a. Alcohol Recovery Center and Halfway House Pages [illegible]

Inadequacy of facilities and staffing is prominent. An interpretation that was communicated to [illegible] ment [illegible] of the [illegible]

720 a. YWCA Shelter Pages [illegible] and [illegible]

The study should have dealt with the [illegible] stated in the letter from the Director which was [illegible] Paragraph [illegible] of Part [illegible] of this Report.

b. Legislative Items Pages [illegible]

731 At page [illegible] last sentence of the [illegible] paragraph should read: "Transient [illegible] the [illegible] industry, [illegible] due to [illegible] to facilities located in the region."

At page [illegible] the second full [illegible] is attributable [illegible] to [illegible] the [illegible] the [illegible] demands.

720 c. Short Comparisons Pages [illegible]

The Study has failed [illegible] [illegible] [illegible]

720

Oranoma a Safehouse Pages [illegible] to [illegible]"

Attention is called to the [illegible] 'Identified inmost needs' at page [illegible], name[illegible]:

Lack of facilities for men and children

Lack of [illegible] for emergency [illegible] shelters

Lack of funding for child abuse programs

Community Action of Laramie County [illegible] Pages [illegible] to [illegible]

Second paragraph on Page [illegible] should read "[illegible] full time staff trained to [illegible] treat battered women's [illegible] as it are. This center will [illegible] offer a wide [illegible] women [illegible] [illegible] [illegible]

731

720

720

"trusts". Page [illegible] first paragraph:

Correct ratio in third paragraph to read "The normal staff to client ratio is about 1:15". This correction renders the next sentence inappropriate.

Correct fourth paragraph from the end of page [illegible] to read "A modular building has been purchased [illegible] for this purpose.

Correct next sentence to read "Outside of financial [illegible] about the mobile building. The building is not to be purchased at the [illegible] because there is no available [illegible] at this time."

720

Correct third paragraph from bottom of Page [illegible] to read "[illegible] and children's [illegible] are [illegible] classified as mild, [illegible] managed"

The [illegible] emotionally disturbed children [illegible] of the Laramie area. It is not to be added in the [illegible] Plans are [illegible] on the drawing board. At first paragraph [illegible] of page [illegible]

[illegible] refer to be corrected to [illegible] paragraph [illegible] the word "normal." This seems [illegible] [illegible] is [illegible] from eight to age five.

Correct third paragraph of the [illegible] "Data [illegible] [illegible]

[illegible] is a fair [illegible] and [illegible] of [illegible] [illegible] [illegible]

and Jasuda, 1974.

In Campbell County, Wyoming, Bowyer (1975) reported an increase of 9.5% in state mandated commitments and an additional 10% in mental health center admissions. Similarly, the county's suicide rate increased 62.5% during the period from 1970 to 1973. In four other counties in the northern Wyoming region, state hospital admissions increased by 19.5% and mental health center admissions increased 1% during the same period.

In Craig, Colorado, 70 known and suspected child abuse and neglect cases reported a disproportionate increase in mental health case loads. Between 1970 and 1980, compared to a population increase of 41% (Colorado Division of Planning, 1981), Bowyer (1980) found a 200% increase in mental health case loads in the Craig Mental Health Center. Although the number of case loads were two and one half times greater than for Colorado as a whole (Colorado Sands Project Group, 1979).

To overcome various validity and reliability concerns about the use of mental health case load data, Jarvis (1978), Jarvis (1981), Jarvis, Bridges, and Hirsch (1981) employed a different methodology to study the true prevalence of mental illness problems in impacted communities. In this study, the peak of the four impact stands (street corner, home, hospital, and jail) were used to accurately measure and predict the number of mentally ill persons in a community. Rather than relying on the number of persons who actually seek treatment for mental illness problems, this methodology estimates the number of persons who should seek treatment based on the number of persons who are actually mentally ill (Jarvis and Hall, 1982).

[illegible]

Three boomtowns in New Mexico demonstrated significant increases in alcohol abuse, as measured by hospital admissions and DWI arrests during the first 1976 period of their booms (Mikkman, Hunt, Peace, Perez, Chronic, and Boyd, 1980). Gallup, New Mexico, grew at a 2.7% annual rate, while alcohol hospital admissions rose by 43% per year and DWI arrests increased by 20% annually. Farmington expanded its population at a 4.3% rate during the time that alcohol hospital admissions increased 27% and DWI arrests went up 9% per year. The Grant/Milan area grew at an 8% annual rate, while alcohol hospital admissions increased 130% per year and DWI arrests increased 12% annually. These figures for the Grant/Milan area represent over a 1000% increase in specific medical, health and crime statistics related to alcohol abuse compared to their absolute population increase.

Crime

Crime is also reported as a frequent problem in boomtowns. While the population in Rock Springs was less than doubling, the number of calls to the police department increased from 3,000 to 36,000 (High Country News, 1973). The reported crime rate apparently did not keeppace with the police calls though, as Brookshire and D'Arge (1980) found crime rates to be elevated in auto theft and grand larceny but not in several other areas when Rock Springs was compared to 35 other western communities of similar size. Taft (1981) revealed that Rock Springs officers started keeping accurate statistics for the first time in 1980, and discovered an "unbelievable" crime rate -- 40 armed robberies, 333 assaults, and four homicides in a town of 20,000.

In Gillette, Wyoming, Thompson (1979) found that crimes against property increased during a period of growth, but that crimes against persons did not significantly increase. In the years following his research from 1970 to 1981, major offenses jumped 52% (Taft, 1981). In addition, data on violence reported in a survey during the summer of 1980 documented rates in Gillette to be twice that reported in a similar national study (Lockner, 1980). "Police in almost every energy boom town in the Mountain West report a phenomenal growth in criminal activity since the energy industries settled in. In towns where nabbing speeders was once the primary function of police, officers are now called on to handle rape, armed robbery, and murder." (Taft, '81, 9).

In Emery County, Utah, two officers handled 94 cases in 1975. "Since that time, the population has quadrupled, and the department has grown to 20 officers who handle more than 4,000 cases a year. It's a standard scenario: ... more rapes, more murders, more vandalism" (Taft, 1981, 9). Evanston, Wyoming reports larceny thefts, aggravated assaults, and sexual assaults as the most dramatic crime increases documented so far in their boom (Ft. 19[illegible]

[illegible]

[illegible]

[illegible]

JOHN B. ROGERS
Attorney at Law

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CHEYENNE, WYOMING 82003
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October 12, 1982

The Honorable Don Erickson
Mayor, City of Cheyenne
Municipal Building
2nd Floor
Cheyenne, Wyoming 82001

[redacted] Nebraska
Socioeconomic Impact
Study

Dear Don:

The Peacekeeper Task Force of the Cheyenne Chamber of Commerce and your Economic IMPACT Committee have the following comments concerning the Wyoming and Nebraska Socioeconomic Project Study (SES).

Our overall impression of this report is that it is pertunctory and superficial. This is perhaps understandable in view of the history of the report. It appears to have been ordered by R. Berger and the Air Force as a "political concession" resulting from the public reaction to Governor Herschler's decision not to require an Industrial Siting Act application for the Peacekeeper project.

1228 More specifically, the report is deficient in information and analysis relative to the role of the private sector in providing services and materials to be used on the Peacekeeper project and its supporting services. As just one example, Paragraph [illegible] Recreation makes no mention of the role the private sector [illegible] recreational services to our citizens. To mention movie theaters, bowling alleys, night clubs, health clubs, dance studios and other private sector recreational providers [illegible] there could be listed

[illegible]

[illegible] and future residents [illegible] not in the economic [illegible] high [illegible] quality.

2. Instead of the [illegible] limitations of [illegible] private and available scientific technological [illegible] research in order to understand the [illegible]

3. Efforts to document mental health problems [illegible] communities as [illegible] the normal community [illegible] for communities [illegible] a sum.

4. The cost should not be forgotten, as [illegible] have been documented to [illegible] efforts should [illegible]

The Honorable Don Erickson
Mayor, City of Cheyenne
October 12, 1982
Page 2

The report does not deal at all or deals inadequately with certain fundamental economic issues which will be of extreme importance to this community should the Peacekeeper Missile be located here. One example of a topic not discussed at all is the potential inflationary pressure which could be created by a temporary population increase of some 7,700 persons. Almost certainly housing costs will be initiated, at least in the short term, and it is quite possible that other goods and services will be similarly affected. However the report, at page 1-1, under a discussion of the impact of the project on the local economy states that "there are no adverse impacts resulting from the immigrant population per se." This statement is at best misleading and at worst untrue.

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The report also provides little or no guidance for the community as to how legitimate mitigation measures should be secured and financed. Again, as just one example, the ASES identifies a problem already identified by our committee in the housing area. On page 2-27 of the report is the statement that "there is a need for an explicit, comprehensive housing plan." In the absence of such a plan, there is the potential for builders, trailer park owners, developers, entrepreneurs, and financial institutions, each acting as an individual profit-maximizing unit, to produce housing in excess of actual future needs." The mitigation measure recommended to deal with this problem is identified on page 2-28. It is there stated that "a full service residential facility or transportation provided to and from a remote location would reduce the impact on a given community, and would most likely affect the one-mile area." However, the report goes on to make it quite clear that the Air Force has absolutely no plans for such a development and offers little or no guidance to the community concerning ways with which to deal with this major problem.

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The report does not provide sufficient data nor presentation of methodology with which to allow local decision makers to analyze potential impact. An important example occurs with regard to the fundamental question of employment of locally based workers. The table on page 2-14 suggests that the peak immigrant population impact will occur in the year 1987 and will consist of approximately 4,700 immigrant workers. Based on the methodology outlined in the document, the standard multiplier formula available [illegible] in analyzing the manpower requirements estimated in each case, the ANALYSIS calculate

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The Honorable Jon Erickson
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240 the total population impact in the year 1987 to be 7,645 individuals. This figure must be adjusted for the possible hiring of local workers. However, nothing in the wNSIS provides us with sufficient information to calculate this adjustment. The whole discussion is a bit hazy at best, but information we have no way of assessing its validity. It appears to be imperative that either the Air Force or URS Berger provide us with sufficient information concerning projected local hiring by job classification to allow for meaningful analysis.

Many of the projections, estimates and assumptions contained in the wNSIS are also suspect. However, it would appear best that the specific agencies about which these projections and assumptions are made should evaluate their accuracy.

Finally, it is unfortunate that the wNSIS is not intended for public review and revision. Obviously the observations and recommendations contained in this document will be taken into consideration by decision makers at the federal, state and congressional levels. In view of this, a clear public record should be made by the City of Cheyenne and the State of Wyoming that this publication is not considered to be total, reliable

Sincerely,

John B. Rogers
Chairman, Peacekeeper Task
Force

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-359

LARAMIE COUNTY HEALTH PLANNING COMMITTEE 219

[illegible] EVANS AVENUE ROOM [illegible]
CHEYENNE WYOMING 82001
307 [illegible]

November 21, 1983

The Honorable Jon Erickson
Mayor of Cheyenne
[illegible] Building
[illegible] 16th Avenue
Cheyenne, Wyoming 82001

Dear Mayor Erickson:

Enclosed are the comments of the Health Facilities and Services Subcommittee on the Draft Environmental Impact Statement, Peacekeeper in Minuteman Silos. The Governor's Planning Office had asked me, as a representative of the Laramie County Health Planning Committee, to comment on the DEIS; therefore, I also sent a copy of these comments to that office.

The comments on the DEIS speak for themselves. However, on behalf of the Subcommittee, I would like to make some comments on the whole process. First, the number of documents and the volume of material for [illegible] committee to read has been staggering. Since the President first announced his intentions approximately one year ago, the conscientious members of the subcommittee have received and in many cases commented on portions of all the following documents:

1. Legislative Environmental Impact Statement. M-X Closely Spaced Basing.
2. Peacekeeper Closely Spaced Basing, Environmental Planning Technical Report.
3. Wyoming and Nebraska Socioeconomic Impact Study.
4. Draft Environmental Planning Technical Report.
5. Draft Environmental Impact Statement.

As you know, all of these documents were lengthy, often multi volume, and not generally organized for reader convenience or ease of review. This, combined with the Air Force's own confusion about basing mode added greatly to the work of the subcommittee.

Also, I and some other persons I have talked to were concerned by the apparent lack of communication between the IMPACT process and the State's activities. This resulted in different deadlines for comments on various

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a general perception that comments made to one entity were not always shared with the others. I feel the various governmental entities could have done a better job of coordinating and communicating with the many participants in this whole M-X process.

Despite these criticisms, I believe the [illegible] has been a positive one for the community. Because of our own and the Air Force's assessments, we know more about Cheyenne and Laramie County than we have ever known before. The challenge will be to now use this information in a positive and coordinated manner for the betterment of the community.

Sincerely yours,

Jane L. Dorn
Planning Coordinator, LCHPC
Chairman, Health Facilities and
Services Subcommittee

JLD:eb

Encl: 1

c: Tom Bonds

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
PEACEKEEPER IN MINUTEMAN SILOS

November 18, 1983

COMMENTS BY: Health Care Facilities and Services Subcommittee, IMPACT Team

GENERAL COMMENTS ON DEIS

Population Projections

DEIS, p. 3-15, Table 3.1-1, "Immigration Estimates and Baseline Total Population ... by County"

In this table, the Air Force presents the projects of Laramie County population through 1991 under both baseline and project conditions. The baseline projections differ significantly from those produced by the State of Wyoming ("Wyoming Population and Employment Forecast Report, 6th Edition," Dept. Admin. & Fiscal Control, July, 1983). The two projections are compared below:

. . . . . .

Comparison of Baseline Population Projections
DEIS and State of Wyoming

Source	1983	1984	1985	1986	1987	1988	1989	1990	1991
DEIS	73,394	74,960	76,556	78,147	79,735	81,327	82,901	84,483	86,064
State of	70,457	71,248	72,911	74,246	75,859	77,437	79,197	80,777	82,546
Difference	2,937	3,712	3,645	3,901	3,876	3,884	3,704	3,706	3,518

. . . . . .

220 Although the generic method of developing the EIS projects is an evaluation of the MMSIS, the Air Force does not explain its rationale for modifying state projections or the reasons why the two sets of figures differ.

In terms of health care services, the higher but not unreasonable DEIS projections make the project impacts appear less significant than if the state's figures were used. The use of the higher DEIS population reduces the ...

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220 professionals to accomodate the impacts when professional to population ratios are used to calculate need (i.e., if in baseline year 1983, the ratio is so many professionals per 73,394 rather than per 70,457, the projected future need for professional staff under the proposed action alternative will be smaller and the Air Force is responsible for less mitigation). Overall, the use of the higher Air Force projections in the DEIS tends to lessen estimates of impact, since the immigrant population from the project appears as a smaller percentage of the total population.

The reasons for the selection of the Air Force projections and the difference between these and the State's projections should be addressed in the EIS.

Transient Population

221 A significant concern of the health care community that is not adequately addressed in the DEIS is the potential of the Peacekeeper project to attract many unemployed and/or transient persons, including entire families into Cheyenne. The problem is acknowledged, but the potential magnitude of the problem has been seriously underestimated. Cheyenne, located at the crossroads of major east-west and north-south transportation routes, already has a significant transient problem that affects many health and human services. Further, data from COMEA Shelter and the Salvation Army show the problem is growing. The State Job Service and the Laramie County Department of Public Assistance and Social Service, based on years of experience in dealing with the problem, estimate that the Peacekeeper project could attract as many as ten applicants for every available job--five who are sincerely applying for the job, and five more who are "riding the system."

Both the Laramie County Department of Public Assistance and Social Service and the City-County Health Unit have already had to assist individuals and families who claim they came to Cheyenne because of the possibility of employment in the Peacekeeper project. If these people are already coming to Cheyenne, how many more will come as actual hiring and work start?

552 The transient and unemployed may be significant users of health care services. They often lack adequate food, clothing, and shelter, and appear more vulnerable to illness. Because they have little money, they often [illegible] are until they are [illegible]. These patients [illegible] Laramie County Health Unit or hospital emergency rooms, [illegible]. They may also seek help from Southeast Wyoming Mental Health Center, [illegible] the Center's various alcohol treatment programs.

In nearly all instances, the cost of caring for these transient or [illegible] patients is born by state, county, or city-funded programs [illegible] written off by the care providers as charity or bad debt.

The EIS should address the impacts of the transient and [illegible] on both human services and health services.

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The problem of planning for transients is admittedly one of not being able to predict numbers. To my knowledge, there are no good methodologies for forecasting transient numbers. Local experience is probably the best basis for any estimations. The Air Force appears to have attempted forecasting the transient population that will use COMEA Shelter during the project by assuming that transient numbers are directly related to the size of the resident adult population in Laramie County (e.g., one transient per so many residents, p. 3-104, Draft EPTR, Public Services and Facilities). There is absolutely no basis for such a projection method. The number of transients coming to a community will vary significantly, depending at least upon the local, regional, and national employment rates, the number and kind of jobs perceived as available in the community, transportation routes and services, geographic location, climate, time of year, and undoubtedly many other factors.

553 Since there are no good techniques for predicting the number of transients, and a large transient population may be an unavoidable consequence of the Peacekeeper project, mitigation measures should include a monitoring program that allows immediate identification of unmet needs associated with transient problems and modification of mitigation measures to meet these unmet needs.

COMMENTS ON HEALTH CARE ASPECTS OF DEIS

Hospitals

DEIS, p. 3-107, para. 6

541 The DEIS correctly points out that Memorial Hospital of Laramie County may have to expand the obstetrics unit of the hospital to accomodate an increased birth rate during the project. While this would generally only represent an acceleration in the growth of this service, this still should be addressed in the DEIS. An acceleration in a building or development program represents lost opportunity costs. That is, if the hospital did not have to expand the obstetrics program earlier than planned, what other services might instead have been developed or expended?

222 Also, if the hospital is to rationally plan for an early expansion of [illegible] services, it will need better demographic data on the immigrant population [illegible] is now available in the DEIS. "Ages of workers." "Number with families."

Emergency Medical Services

DEIS, p. 3-108, para. 1

542 The DEIS correctly points out that existing emergency medical services are generally adequate to accommodate the increased service levels of the proposed action. One possible problem area is the handling of accidents at remote construction sites such as launch facilities. The Draft EPTR, Public Services and Facilities, p. 3-111, suggests the "provision of emergency medical transfer

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542 capabilities at the staging areas." This mitigation measure should be expanded to include the requirement that one or more persons with basic emergency care training be available at each staging area and other construction activities.

City-County Health Unit

DEIS, p. 3-108, para. 2

The DEIS states that "Additional staffing under the proposed action should accomodate the service demand increase due to the Proposed Action. Some additional short-term workload can be anticipated, but not enough to warrant additional staffing for project-related immigrants."

The above quoted conclusion is not supported by the Air Force's own analysis of the present circumstances of the Nursing Services at the Health Unit. In identifying impacts and needed mitigation actions for the Nursing Services, the following information should be considered:

543
1. The City-County Health Unit is already operating at [illegible] and any additional population will further stress service provisions.

2. In the Nursing Unit, there is a current need for at least one additional public health nurse and the Environmental Health Division needs a field sanitarian.

3. State funds for an additional public health nurse will probably not be available, and the County will have to pay for an additional nurse if one is provided.

4. The current professional and paraprofessional staffing of the Nursing Service is as follows (the data on p. 3-115 of the MMSIS are incorrect):

Health Officer - M.D., full-time (also oversees Envir. Health Div.)
Dir. of Nursing - full-time
Nursing Supervisor - full-time
Nurse Practitioners - 4.5 FTE
Public Health Nursing - 10 FTE
WIC Nurse - 1 FTE
Family Planning Nurse - 0.5 FTE
Afternoon Clinic Nurse - 0.5 FTE
Nutritionist - 1 FTE
Home Health Aides - 2 FTE
Clinic Aides - 2 FTE

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A physical therapist also works half-time on contract and other professional services are contracted for as needed. In 1983, the Nursing Services employed 23.5 professional and paraprofessional staff (excluding the Health Officer who works at least half-time for Nursing Services and is involved in direct patient care) just to meet current needs. If the additional, needed, public health nurse position is added to the total, a baseline standard of 24.5 professional and paraprofessional positions in Nursing Services is established. This is the standard against which future needs should be measured.

Staff to population ratios are an imperfect method of projecting needs, but the ratios are useful as indicators. Using the Air Force's own projections of baseline and proposed action populations in the following table, one can clearly see that the proposed action will place a burden on the Nursing Services which cannot be dealt with just by the additional staff needed under baseline conditions.

. . . . . .

PROJECTIONS OF NURSING SERVICE PROFESSIONAL STAFF

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	1983	1984	1985	1986	1987	1988	1989
Baseline Population	73,594	74,960	76,556	78,147	79,[illegible]	81,521	82,[illegible]
Staff	24.5	25.0	25.5	26.0	26.[illegible]	27.[illegible]	[illegible]
Proposed Action Pop.	73,594	74,960	79,190	81,726	83,024	83,305	84,[illegible]
Staff	24.5	25.0	26.[illegible]	27.5	[illegible]	27.5	[illegible]
Minimum Additional Staff Needed Due to Project	0	0	1.0	[illegible].5	[illegible]	3.0	[illegible]

. . . . . .

As the above calculations show, during the period between [illegible] related population will create a need for at least [illegible] or paraprofessional persons in Nursing Services. [illegible] need for at least 3.5 FTE in Nursing Services.

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Further, the Air Force, in both the WNSIS, Vol. [illegible] and the Draft EPTR, Public Services and Facilities, p. [illegible] puts the following facts:

- "Laramie County has a young population and [illegible] The projected population will continue this trend. With the high birth rate comes increasing demands on the Public Health Department, i.e. increased numbers of pregnant clients [illegible] for prenatal classes, higher incidence of teenage [illegible] more visits associated with immunizations [illegible] etc."

- "Even if the incoming population has a high employment level, in many instances incoming population, or transient population will use Public Health Department services rather than establishing relationships with private physicians."

- "There has been an increase in venereal disease cases [illegible] all sexually transmitted diseases. In Laramie County, Public Health officials are concerned that as population levels increase, so will the incidence of venereal disease."

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- Starting in fall 1983, school nurses at County School District No. 1 will no longer be taking throat cultures. [illegible] County Unit will experience high rates of throat culture visits as a consequence, further impacting the stressed facility."

Thus, the level of staffing needed under the Proposed Action alternative may actually be higher than baseline projections would indicate.

For all of the reasons cited, the estimation of project impacts on the Nursing Services of the [illegible] Health Unit should be revised [illegible]

Additional staffing under the No Action alternative will not be adequate to accommodate the service demand increases due to the Proposed Action. Significant additional workload can be anticipated, particularly during the peak construction period [illegible] years of 1985 to 1988. During this period, at least [illegible] additional professional/paraprofessional staff persons will be needed to accommodate the increased service demands [illegible] at least 1.5 FTE professional/paraprofessional staff persons will be needed to accommodate the increased service demands since the population, including transient workers, has more public health services per capita than existing [illegible] population, additional staffing related to project-[illegible] population needs may be somewhat higher than the minimum stated above. An appropriate monitoring and response mechanism should be part of the mitigation process for dealing with impacts in the health unit.

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Proposed Mitigation: "Provision of health insurance [illegible] employees [illegible] project contractors."

Comments: This is an acceptable mitigation measure provided contractors can be required to provide this employee benefit. Can this be enforced by the Air Force?

Proposed Mitigation: "Ongoing coordination with the Laramie County Health Planning Committee and other appropriate agencies to ensure that the proper level of planning can be achieved prior to impact conditions. [U.S. Air Force and Laramie County Health Planning Committee]"

Comments: The Laramie County Health Planning Committee has already voluntarily devoted a very significant amount of time to planning for the Peacekeeper project. Since the agency has only one professional staff person, this has meant the agency has been forced to delay other planning activities. The agency is privately supported, does not represent all health entities in the community, and with the current limited staff and budget, can only do a modest amount of coordination and planning. (Note: Table 3.1.5-1 on p. [illegible] of the EPTR, Public Services and Facilities, lists the Wyoming Health Systems Agency as part of the health care delivery system in the ROI. This agency was permanently closed in October 1982 and should not be considered a planning resource agency.)

HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
MAYOR'S IMPACT TEAM

Comments: Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos

November 2, 1983

The Air Force's Draft Environmental Impact Statement does not *pull together a coherent sense* of how the community will be affected by MX development. If the community is to cope effectively with impact, it must understand the scope of the project. Once the extent of impact is clear, local citizens can organize to set priorities for directing growth and preserving the community's quality of life. Developing this
44 understanding and knowledge among local residents is the responsibility of both the community and the Air Force. The Draft Environmental Impact Statement should be amended to provide a more coordinated description of how community life patterns will be changed because of the project.

The Heritage, Values & Well-Being Subcommittee is seriously concerned with human needs and the priority attached to them. Although the avowed purpose for deploying MX missiles is to
466 preserve the national quality of life, local quality of life is being given relatively superficial attention. The Environmental Impact Statement precludes any conclusion that impacts on community well-being will be "high" by defining "high impact" as a situation in which similar changes have not
467 occurred in the past. Neither local policy nor the Air Force impact studies demonstrate adequate concern with well-being issues.

Virtually all local human service agencies will be affected by the MX project. The number of transients, looking for work and requiring emergency shelter and food, will increase dramatically. As housing and other resources become scarce in relation to demand, inflationary pressures will seriously impact low- and fixed-income citizens. As employment opportunities increase, the pool of volunteers to assist in meeting human needs will be reduced. The Draft Environmental Impact Statement addresses these and other human needs, but does not provide for adequate mitigation given the anticipated
89 extent of impacts. Furthermore, the Environmental Impact Statement does not recognize the fact that mitigation must be timely if it is to be effective. Changing the way services are provided takes time, yet the peak of impact is expected within three years. The Environmental Impact Statement must include recommendations for assuring that mitigation takes place when it is needed.

89 Human services in Cheyenne and Laramie County are unable to meet today's needs and will be overwhelmed by an increase in the pace of population growth. Human service providers must be able to respond to MX impact; three activities are essential in equipping them to do so.

576 First, there must be a clear understanding of what the community's human needs are and how they *are being* met. An immediate needs assessment is imperative. The assessment must include an honest appraisal of whether or not the community is fulfilling its responsibilities to its citizens.

553 Second, there must be continuous monitoring of changing needs and the ability of the community to deal with these changes. A permanent, ongoing monitoring system must be instituted. We commend the Air Force and its consultants for recognizing the importance of assessing needs and monitoring impacts by recommending both as mitigation measures in the Environmental Impact Statement.

Neither assessment nor monitoring, however, will mitigate impacts. There must be a way for the community to be sure it can cope, in time, w n needs identified during assessment and monitoring. We recommend that a fund be established from which support for human services can be drawn when urgent needs are recognized. This is the most appropriate mitigation measure for issue areas in which the range of MX impacts is difficult to quantify. It allows the community to cope with change without overfunding some services and shortchanging
88 others.

The Environmental Impact Statement should recommend that a draw-down fund be established as an integral part of the recommended monitoring program. The monitoring program and draw-down fund should be administered jointly by the Air Force and the local community. If both groups work together, the Air Force will be assured that mitigation monies are being spent in response to project-related impacts. The community will bear the responsibility for setting priorities and coordinating local services.

The assessment/monitoring/drawdown fund process is one which should be considered for areas of impact other than human services as well. It provides a reasoned approach to dealing with impacts. This is preferable to requiring the community to guess what its needs will be before baseline needs are assessed and before the scope of the project is clarified.

The Environmental Impact Statement pays inadequate attention to the time after the peak of MX construction. Demands on human services will continue to increase during this period. For example, nearly half of the Mental Health Center's clients are unemployed persons. The monitoring system, including Air Force participation, will be essential to understanding problems arising during the "bust". The draw-down fund must be applicable to the post-construction period.

88 Decision-makers must be given the tools to manage change. The long-range implications of actions must be built into their day-to-day activities. Priorities are not being explicitly set; as a result, they are set by default. Because of the immediacy of the expected impact, we must clarify issues and set priorities now. Only by doing so can we assure that mitigation monies will be sufficient to deal with the most important issues and applied where they are needed. The Air Force should recognize this activity as central to the mitigation process and should focus attention on it, in the Environmental Impact Statement, as a mitigation measure.

In conclusion, the Subcommittee argues that a more direct approach to solving community problems needs to be followed. The focus must first be on the lives being affected, followed by a concerted effort to generate solutions meaningful at the personal level. The Air Force and local leadership, working together, must immediately create a forum to build a community consensus about impact issues.

Submitted by the
Heritage Values & Well-Being Subcommittee

Barbara Rogers, Chair

Lawrence Anderson
Rick Bryant
Pat Fleming
Jim Hecker
Ron Rogers
Bob Stewart
Robin Volk
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Lynn Birleffi
Bill Dubois
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Shirley Kirkbride
Phil Rosenlund
Fr. Eugene Todd
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HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
MAYOR'S IMPACT TEAM

Comments: Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos

November [illegible], 1983

The Heritage, Values & Well-Being Subcommittee has reviewed in detail several sections of the DEIS. These sections are:

Social Well-Being
Public Finance Human Services Suggestions
Land Use

We have also made more general comments here relative to the Housing Section.

Social Well-Being

The definitions of levels of impact are not satisfactory. "High" impact is defined as a situation in which similar changes have not occurred in the past. This is foreign to common usage of the phrase "high impact" and results in a
466 position from which no impact on well-being can be rated high. The Subcommittee recommends that the difference between "moderate" and "high" impact be one of degree: the degree to which resources will be adequate to deal with change.

The Subcommittee believes that the increase in number of transients/indigents due to the project will be unprecedented. Therefore, even if the impact definitions are not changed, impact from transients/indigents must be rated "high". The
485 recommendation that a federal center be established for this population is a good one. However, more details are needed as to how transient services will actually be provided. There is presently a shortfall in the community's ability to serve this
567 group. Mitigation recommendations must be specific about the way in which a new center will be able to handle a geometric increase in the problem.

Impacts on social well-being will not be confined to the short term. Short term impacts by definition on page 1-42, will cease when construction ends. Indigents will stay. Social alienation will continue and probably increase as previously employed people become unemployed. It cannot be assumed that unemployed do so at pre-existing when the project is over (e.g., families, who will be seeking some stability).

486 The DEIS concludes that the rate of social alienation may increase due to the project, but that the incidence of social problems will remain unchanged. The social problems cited (family violence, substance abuse) will surely rise in proportion to an increase in alienation.

426 Inflation is judged to be a short-term impact. The Subcommittee believes that it will be long-term as well. Prices are not likely to go down. As the number of unemployed persons rises, there will be more people with limited incomes. Furthermore, fixed- and low-income citizens will have to maintain debts incurred during the construction period after construction has ceased.

427 "Downturn problems" relative to the housing market and local businesses are cited as short-term impacts, but "negligible in the long run". The Subcommittee maintains that the impact has been understated. Past experience in the community demonstrates that the problems of over-built housing and over-expanded businesses will be most evident after construction. These problems will be with use for years, unless action is taken now to prevent them. An "information and coordination program" may help the mitigation process, but this is insufficient to deal with the magnitude and the extent of the impact. Mitigation recommendations must be expanded to provide some assurance that "bust" problems will be avoided.

469 The Subcommittee seeks assurance that the Air Force will not assume that potential "benefits" to social well-being will outweigh some of the project's adverse effects. In the first place, the issues are not closely related. Furthermore, we question whether an increased tax base and ability to provide more services will actually be a benefit. The downturn may just create a bigger problem by creating a situation in which services must be reduced once citizens have higher expectations.

491 The DEIS also notes that an opportunity to "take innovative actions" will be a benefit from the project. This will not occur unless an approach to mitigation makes it happen. The mitigation section should include more direct discussion of this issue.

568 Increased use of volunteers to provide human services will not be a viable mitigation measure. It is true that this community benefits from an unusually high proportion of volunteer work. On the other hand, volunteers can only be stretched so far and it would be unfair to rely on volunteers to mitigate project related impacts.

95 Several mitigation measures can only work if local decision-makers are equipped to make decisions in a rapid-growth situation. An avenue for preparing them to deal with impact must be incorporated into the mitigation section.

88 The Subcommittee agrees with the DEIS's recognition of the importance of assessing needs and monitoring change. We emphasize again, however, that neither of these is actually a mitigation measure. The mitigation section should recommend that a fund, tied to the monitoring program, be established and administered jointly by the Air Force and the local community. This would be the most effective way to assure that there is the ability to respond to problems identified by the monitoring program.

While the concept of a draw-down fund appears controversial from the Air Force's point of view, it is the most reasonable approach to mitigation. By tying the use of the fund to monitoring, the Air Force can be assured that mitigation monies are spent in direct response to project-related impacts. By performing a needs assessment as part of the monitoring program, the community will realize that mitigation monies cannot be spent to make up for non-project-related shortfalls. By providing for joint administration of the fund, the community and the Air Force can reach a consensus about the responsibility of each to deal with identified problems. The fund should be large enough to provide timely response. Unspent monies should be returned to the Federal government.

89 A key aspect of the draw-down fund draws attention to a key concern of the Subcommittee. All mitigation measures must be timely to be effective. We are concerned that the mitigation section does not focus on this issue. The Final EIS must be specific about the way in which the community will be assured that steps will be taken in time to work effectively.

Human Services

569 The DEIS states that nearly half of the Mental Health Center's clients are unemployed. Yet the project-related impact is defined as short-term. Since unemployment will rise dramatically, the long-term (post-construction) impacts on this and other human service agencies must be evaluated.

578 The Human Services section concludes that transient in-migration will have a low impact on services to this group. This is simply incorrect. Clearly the impacts will be substantial and clearly new facilities and staffing will be required. For virtually all of these agencies, any increase at all will require staffing and facilities. The definition of "low" impact is that no staffing or facilities would be required.

569 All human service impacts are rated short-term only. As discussed above, this is incorrect.

Land Use

1116 The definitions of levels of impact for urban land use are incongruous. The DEIS assumes that impacts will be low or negligible if development controls have been adopted. There are only three criteria used to define land use impacts: the existence of development controls, depletion of vacant land and under-used developed land. While these criteria are important, they are off the mark when the general issue of land use is being considered. Land use is a quality of life issue. Questions to be addressed in a land use analysis should include:

1109
- Will changes in land use patterns change the local quality of life, real or perceived?
- Will adequate land be available to meet needs into the future?
- Can project-related land use changes be managed to reduce personal disruption? to maintain the community's character? to promote local goals towards which the community is already working?

The definitions for rural land use impacts are more appropriate.

1110 The issues listed for determination of significance are more useful. However, if these issues are used in the analyses, we fail to see how the DEIS concludes that there will be no significant land use impacts.

1111 Since historic data demonstrate that existing land uses do not meet "generally accepted standards" and that standards have changed significantly over time, it is incorrect to assure that new growth will "require development according to those same standards." Also, why was it assumed that the

1120 supply of vacant land in the City would remain constant? This assumption does not coincide with current policy, which promotes infill.

1129 On what basis was the project-related demand for 76 acres of mobile home development figured? With regard to housing and land use, the Subcommittee recommends that more alternatives be considered, instead of generating figures **1128** which may not be desirable from the community's point of view.

Underutilization of land depends on how needs are met. If peak demand is met through new subdivisions, underutilization will be a much larger problem than if infill policies are followed. Again, alternative scenarios would be **1124** far more useful in assessing impacts and defining mitigation. Furthermore, underutilization of land is already a significant community problem. A sizeable increase in the problem cannot be rated low and not significant.

1109 Rural land use analysis doesn't recognize the important relationship between land use and quality of life. This must be built into the discussion.

The analysis of road alternative R3 impacts on land use is inadequate. If this "could open up access to land west of **1126** F.E. Warren Air Force Base," it will have a major impact on rural residential development. This is a serious concern that has been glossed over. The only impact mentioned is possible underutilization of the new interchange.

314 More detail is needed in the mitigation section. How and where would the temporary project worker facility be constructed? How would re-use be accomplished? When will construction on this facility begin? If the facility is to be an acceptable mitigation measure, planning for it must begin immediately. Conventional private development to accommodate the MX influx is already being planned. This increases the potential for greater negative impacts and decreases the chance for success of the recommended temporary facility.

88 The Subcommittee agrees that a monitoring program is essential to mitigation. We recommend again that the monitoring be tied to a system which will allow response to problems in time to be effective. A draw-down fund should be considered (see discussion of Social Well-Being).

1130 What is the intent of the recommendation for "implementation of local...policies"? Is a change recommended here? The Subcommittee believes that the positions of decision-makers with regard to local policies should be strengthened. If this is the point, it should be clarified in the EIS.

1096 It would be difficult for the community to successfully promote reclamation of a mobile home park for an alternative use within 6 months after the end of construction. The EIS must be more specific about how this would be accomplished and what the re-use would be.

88 There *are a number of potential mitigation* issues which should be considered here but are not. The possibility of tying a draw-down fund to the monitoring system should be discussed. "Alternative uses" are suggested in general but none are listed in particular. No effort has been made to provide assurance that mitigation measures will be taken in time to be effective.

1112 Finally, the Land Use Section minimizes impacts. When more impacts are recognized as important (and they must be) it will be clear that more mitigation will be needed.

Housing

315 Decline cycle impacts for single-family housing must be considered long-term (as well as short-term), as the excess supply will certainly continue beyond 1990. The chart stops at 1990, but this cannot be used to assume that impacts will stop then. (Perhaps the time frame of the chart should be extended.)

Apparently the oversupply of mobile home units will continue for years beyond 1990. This will be a major problem for the community.

334 The impacts on tourist industry from project-related use of hotel/motel/campground units must be considered.

318 Beneficial effects due to sales value and rental income are temporary in nature. The higher the benefit over the short-term, the greater the long-term adverse impact. Citing a beneficial effect, then, clouds the picture and misleads the reader.

325 A better explanation of why impacts on multi-family housing will be low and not significant is needed.

1122 What "incentives" should be provided to builders and developers? This general statement does not provide any constructive suggestions.

330 A "review" of "plans, policies and regulations for mobile home and recreational vehicle parks" is recommended. This is not mitigation in itself.

In conclusion, recommended mitigation measures are insufficient and the list is incomplete. Housing impacts are among the greatest, most significant, projected impacts. Yet mitigation recommendations would imply that little action needs to be taken. Surely more can be done than providing data, offering incentives, reviewing plans and considering a man-camp.

222

The City of Cheyenne, Wyoming 82001

MAYOR
DON ERICKSON

CITY COUNCIL
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WANDA MILLER
GEORGE SCOTT, MD
RONALD N. ROGERS

MEMORANDUM

TO : Mayor Don Erickson

FROM : Heritage, Values & Well-Being Subcommittee IMPACT Team

SUBJECT: Comments pertaining to the Wyoming & Nebraska Socioeconomic Impact Study

DP/lkn

THE HOME OF CHEYENNE FRONTIER DAYS

HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
Mayor's IMPACT Team

Comments pertaining to the
Wyoming & Nebraska Socioeconomic Impact Study
October 5, 1983

1036 Transportation vs. location of residence. The transportation section does not address impacts from putting all the new population on the south side.

243 Job seekers/transients. The conclusion that job seekers would need no more than short-term aid (p. 3-270) appears absolutely incorrect. In another section (p. 3-282), it is stated that the increase in transients due to the project is unknown.

In considering project impacts, the assumption that ratio of transients to population will not change seems erroneous (p. 3-282). Also see chart on p. 3-285.

It seems likely that people who will be here for short term jobs may very well be here before (waiting) and after (looking).

259 Unemployment rate. The State's unusually high unemployment rate and lack of funds to deal with the problem should be noted.

Comparison with previous missile activity. There should be comparisons with the Atlas boom-bust cycle (and other similar cycles here and or in other places).

777 County road maintenance. To classify County Road and Bridge equipment as "good" (p. 3-61) misses the whole point, which is level of service. The County is presently unable to take on maintenance of new paved roads, which points out one problem in this area.

634 Law enforcement facility. How certain is it that the new law enforcement facility will be built? How much impact will occur prior to its completion? (p. 3-13). It is unreasonable to assume completion by 1984 (p. 3-82), given progress to date.

640 Law enforcement services. It seems that increases in demand for law enforcement services because of population growth (p. 3-18) will require special measures. Chart (p. 3-15) calls out need for additional equipment.

645 While education and publicity efforts (pp. 3-18, 19) are useful and an important part of the mitigation program, these will be insufficient to deal with such problems if they occur.

643 It is unlikely that law enforcement needs will drop immediately as project-related employment drops (p. 3-83). This may be the worst time, when unemployment begins to rise.

644 Identified impacts include staff, cars and space. Why aren't these mentioned in mitigation section? (p. 3-87)

Government services. Some County offices are overstressed at peak times. This should be addressed.

An important issue, ignored here, is whether or not local elected and appointed officials can function effectively under impact pressure. There are significant problems now with the decision-making process, particularly in terms of conceptualizing the long-range impacts of decisions. If decisions are made even more quickly, with even less careful thought, quality-of-life in the community is likely to suffer.

The analysis of how a City Council operates (p. 3-37) may be correct in theory, but is incorrect in reality.

Projections of City staff needs due to project impact (p.3-45) cannot be done by extending current ratio. For some offices, need will increase more substantially. For example, a number of offices are already experiencing overload as a result of the environmental impact process.

787 With regard to City staff, amount of overtime presently being worked, and its effect in direct and indirect costs, must be addressed (p. 3-46). Salaried staff are not paid overtime, but may already be overextended.

Are office equipment needs addressed (p.3-48)? E.g., computers, etc.

Short-staffing increases may be temporary (p.3-47), but will also be needed during readjustment after employees have left.

596 Jobs can't be realistically allocated when projection of need is for [illegible] persons.

"If there is a significant backlog of cases now (p.3-49), how can the statement be made that staff and facilities are adequate to serve the present case load?

No mitigation measures (p.3-35) are identified for many identified impacts, including staff needs, overcrowding, needs for special programs and resources.

"If City staff grew by 50% in the last 5 years, why would baseline growth be less in the next 20? If this is in question, are space needs correct? Furthermore, many, most of the mitigation measures proposed throughout place the burden on local government, this will require staffing increases.

Role-related positions seem to being side-stepped much (p. 3-91).

Since U.S. Geexers will impact the area prior to peak employment, [illegible] should be done to be ready for the impact. Otherwise the new [illegible]

599 Laramie County extension service will have an additional workload with impact e.g., 4-H. Outreach services will also be needed.

1073 Pedestrians. If most of the impact population will be living on the south side, pedestrian activity will also increase. School buses will not enter many of the subdivision areas, so the concentration of children walking to schools or bus stops will be greater. These concerns are ignored (p. 3-162).

1036 Traffic. Transportation section does not make provision for the decision to allocate 60% of the impact population to the south side. One issue is road maintenance services which are inadequate now outside of the City.

736 Human social services. Social services are inadequate now and will also be inadequate to deal with future baseline growth. The aMSIS concludes that the project will simply "speed up" needs in this area. This does not deal with the problem, which is that the needs must be met.

Issues of increasing demand for human services among members of the existing population must be addressed (p. 3-101).

737 If there is a problem now meeting social service needs at aAFB (p. 3-203), why are no mitigative measures proposed for the impact situation. Civilian services clearly can't handle an additional load.

714 Recommending partial staff members (p. 3-276 and others) is not very helpful. Also, it is not necessarily true that needs will remain at the same per capita ratio as at present.

722 When facilities are already inadequate (p. 3-278), attention should be paid to the perception of impact, which will be much greater than in a location where services are being provided without stress now.

730 The short-term monitoring system (p. 3-278) could be central to success in handling human service impacts. However, it must be based on a needs assessment and established immediately if it is to be effective. If the goal is quick response to needs, funding must be available to react when needs are identified. An established account for this purpose should be considered. Long-range monitoring is also essential.

743 LOMEA's higher summer use rate (p. 3-281) may not be a trend that continues, especially since it hasn't even been open a year. Also, early summer weather was poor this year.

712 There is a limit to using volunteers (p. 3-282). Volunteers must be considered a limited resource, already nearing its limit. More paid staff will sure to be necessary for many agencies heavily using volunteers now. Elsewhere in the aMSIS, there is a statement that more locals will be employed, this will reduce the pool of volunteers. In short, assuming that marginal demand will be met by volunteers is dangerous.

733 It appears that no change in demand would be detrimental to the Guardian Army.

"If future [illegible] Nation Army expansion will depend on that agency's ability to fund expansion (p. 3-287), attention should be paid to how that funding will be provided.

761 There may be room for expansion for Youth Alternatives (p. 3-288), but expansion will cost money. To assume that impact demand can be met because space is available is to ignore the people and money issues which are even more important.

746 Given the large number of unemployed persons served by the Mental Health Center (p. 3-293), it would seem that clientele will remain high as project employment decreases and probably for some time after that, as local unemployment will be high. Locals will also be dealing with economic "bust" and this will increase the Mental Health Center's clientele.

744 Throughout the human services section, an important issue has not been addressed. This is the fact that the services being provided are not being provided to all those who need them. For example, the Safe House increase in clientele of 35% between '981 and 1982 (p. 3-295) was surely not due solely to a high increase in family violence, more people who needed the service were accessing it. In the same vein, as social service agencies are impacted, their ability to outreach to those in need will decline unless staff and facility increases are ahead of the impact.

With regard to Safe House (p. 3-296), if there was 35% growth in one year, how can baseline forecast only a 1.2-person staff increase in 8 years (1984-1992)?

742 Needs in the community must be assessed early on to assure that the monitoring system works. How many people are not receiving services because of inadequate outreach capability, crowded conditions, lack of staff, other reasons?

If Community Action has completed a needs assessment (p. 3-299), why is there no basis for projections of future programmatic changes?

724 Community Action section needs to reflect impacts of transients and job seekers due to the project.

751 "Questions of optimum teacher-to-pupil ratios" (p. 3-302) should be addressed in the aMSIS.

741 What is the basis of the assumption that day-care centers serve primarily two-income families? (p. 3-303)

769 Does the "6% increase in demand" forecast for Attention Home (p. 3-328) mean demand, or actual persons served regardless of level of need?

248 aMSIS states the majority of in-migrants will be employed? Where will jobs for spouses come from?

766 Impact on Attention Home is projected on current ratio. But report states existing need is not being met. This implies that the ratio is improper. Basically, this error is repeated throughout the human services section.

735 Listing of unmet needs (p. 3-306) is incomplete based on agencies discussed in detail and woefully inadequate when all the human services agencies listed previously (p. 3-261, ff) are considered. For example, need to expand short-term shelters (LOMEA, Salvation Army); need to provide meals--Funding, Salvation Army); need for more youth counseling (Youth Alternatives, Attention Home). More importantly, this is an inadequate needs assessment. It is based on a summary of the work of only a few agencies and, for the most part, there has been no effort to do more than mention unmet needs.

729 Human services mitigation section (p. 3-307) is unacceptable. Needs assessment must be at the beginning of any mitigation program. The statement "meet agency needs ..." must be more specific to be meaningful. If a monitoring program is established as recommended (by whom? how?), no measures are proposed to assure quick response in case the monitoring system identifies a need. This is essential if it is supposed to work.

711 In general, staffing increases recommended for social agencies seem unrealistic, e.g., one person for Mental Health Center, Attention Home, Youth Alternatives. Figures such as "0.2 full time equivalent" are also unrealistic.

734 Comments from the subcommittee at previous hearings have pointed out that social problems will grow geometrically with rapid growth, this issue has not been considered.

364 Housing. Residential growth in South Cheyenne will be a problem. How were population figures allocated?

362 The suggestion that workers living in a hotel on a permanent basis would move out during Frontier Days (p. 3-342) seems unlikely.

321 The number and percent of vacant lots in the County should be addressed.

366 Trends (p. 3-349), especially with regard to mobile homes, can't continue as they have.

368 How was it determined that "62 units of housing demand would be met by mobile homes" (p. 3-351)? Given the quality and location of many local mobile home parks this seems unlikely.

363 Do we want 98% of the first-year project-related housing demand to be met by local hotels, motels and campgrounds (p. 3-351)? This may not be best for the community.

370 How are housing demands (p. 3-354) to be met? Housing section doesn't even include previous allocation of 60% of the population to the south side. Are services adequate for quantity and location of proposed housing?

375 Will the "type" of workers coming here want to live in mobile homes?

348 How can housing demand forecasts be made available at least 12 months before construction start-up? Construction has to be completed by 1985, next construction season is summer 1984, less than 12 months away.

350 Shouldn't consideration be given to requiring the Air Force to construct/develop housing, as has been required of private projects in other impacted communities? Whether the answer is yes or no, some consideration needs to be given to this alternative (other than man-camps).

351 To suggest that local development regulations be "loosened" (p. 3-354) is ludicrous if anything, local regulations do not provide for quality development and need to be tightened. To call the current situation overregulation is to suggest that housing built during the impact be of the type that will result in an eyesore and in community problems far into the future.

Why should local plans and policies and annexation policies be "updated"? (p. 3-357) These are designed to help the community reach its goals; if anything, they need to be held to strictly.

350 How would re-use of a temporary housing facility be implemented? The idea may be good, although then it should be of permanent, rather than temporary, quality. Also, carrying out this suggestion would require substantial assistance to the community.

347 How do housing issues relate to other facets of the community (land use, government services, etc.)?

244 Employment. Will it be difficult to fill local jobs because of high-paying MX jobs?

800 Libraries. Since apparently a great deal of the new population won't be direct Base employees, wouldn't library expansion (p. 3-208) be more appropriate at the local level?

ADDITIONAL GENERAL COMMENTS

99 Mitigation. In many cases, recommendations for mitigation will clearly be too little, too late. Also, an inordinate share of mitigation responsibility appears to be placed on locals. Most mitigative measures need to be more specific.

435 Bust. The post-construction decline cycle must be addressed, as it will have a significant impact on the community.

100 Methodology. Baseline data is non-existent in many sections. Basis for assumptions and lines of reasoning toward conclusions are unclear.

68 Adverse effects. Basically, the aNSIS concludes that there will be no significant adverse effects from the project. We take exception to this.

223

HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
MAYOR'S IMPACT TEAM

Comments: Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos

November 2, 1983

44 The Air Force's Draft Environmental Impact Statement does not pull together a coherent sense of how the community will be affected by MX development. If the community is to cope effectively with impact, it must understand the scope of the project. Once the extent of impact is clear, local citizens can organize to set priorities for directing growth and preserving the community's quality of life. Developing this understanding and knowledge among local residents is the responsibility of both the community and the Air Force. The Draft Environmental Impact Statement should be amended to provide a more coordinated description of how community life patterns will be changed because of the project.

The Heritage, Values & Well-Being Subcommittee is seriously concerned with human needs and the priority attached to them. Although the avowed purpose for deploying MX missiles is to preserve the national quality of life, local quality of life is being given relatively superficial attention. The 466 Environmental Impact Statement precludes any conclusion that impacts on community well-being will be "high" by defining "high impact" as a situation in which similar changes have not occurred in the past. Neither local policy nor the Air Force 467 impact studies demonstrate adequate concern with well-being issues.

Virtually all local human service agencies will be affected by the MX project. The number of transients, looking for work and requiring emergency shelter and food, will increase dramatically. As housing and other resources become scarce in relation to demand, inflationary pressures will seriously impact low- and fixed-income citizens. As employment opportunities increase, the pool of volunteers to assist in meeting human needs will be reduced. The Draft Environmental Impact Statement addresses these and other human needs, but 89 does not provide for adequate mitigation given the anticipated extent of impacts. Furthermore, the Environmental Impact Statement does not recognize the fact that mitigation must be timely if it is to be effective. Changing the way services are provided takes time, yet the peak of impact is expected within three years. The Environmental Impact Statement must include recommendations for assuring that mitigation takes place when it is needed.

89 Human services in Cheyenne and Laramie County are unable to meet today's needs and will be overwhelmed by an increase in the pace of population growth. Human service providers must be able to respond to MX impact; three activities are essential in equipping them to do so.

576 First, there must be a clear understanding of what the community's human needs are and how they are being met. An immediate needs assessment is imperative. The assessment must include an honest appraisal of whether or not the community is fulfilling its responsibilities to its citizens.

553 Second, there must be continuous monitoring of changing needs and the ability of the community to deal with these changes. A permanent, ongoing monitoring system must be instituted. We commend the Air Force and its consultants for recognizing the importance of assessing needs and monitoring impacts by recommending both as mitigation measures in the Environmental Impact Statement.

88 Neither assessment nor monitoring, however, will mitigate impacts. There must be a way for the community to be sure it can cope, in time, with needs identified during assessment and monitoring. We recommend that a fund be established from which support for human services can be drawn when urgent needs are recognized. This is the most appropriate mitigation measure for issue areas in which the range of MX impacts is difficult to quantify. It allows the community to cope with change without overfunding some services and shortchanging others.

The Environmental Impact Statement should recommend that a draw-down fund be established as an integral part of the recommended monitoring program. The monitoring program and draw-down fund should be administered jointly by the Air Force and the local community. If both groups work together, the Air Force will be assured that mitigation monies are being spent in response to project-related impacts. The community will bear the responsibility for setting priorities and coordinating local services.

The assessment/monitoring/drawn-down fund process is one which should be considered for areas of impact other than human services as well. It provides a reasoned approach to dealing with impacts. This is preferable to requiring the community to guess what its needs will be before baseline needs are assessed and before the scope of the project is clarified.

The Environmental Impact Statement pays inadequate attention to the time after the peak of MX construction. Demands on human services will continue or increase during this period. (For example, nearly half of the Mental Health Center's
88 clients are unemployed persons.) The monitoring system, including Air Force participation, will be essential to understanding problems arising during the "bust". The drawdown fund must be applicable to the post-construction period.

Decision-makers must be given the tools to manage change. The long-range implications of actions must be built into their day-to-day activities. Priorities are not being explicitly set; as a result, they are set by default. Because of the immediacy of the expected impact, we must clarify issues and set priorities now. Only by doing so can we assure that mitigation monies will be sufficient to deal with the most important issues and applied where they are needed. The Air Force should recognize this activity as central to the mitigation process and should focus attention on it, in the Environmental Impact Statement, as a mitigation measure.

In conclusion, the Subcommittee argues that a more direct approach to solving community problems needs to be followed. The focus must first be on the lives being affected, followed by a concerted effort to generate solutions meaningful at the personal level. The Air Force and local leadership, working together, must immediately create a forum to build a community consensus about impact issues.

Submitted by the
Heritage Values & Well-Being Subcommittee

Barbara Rogers, Chair

Lawrence Anderson
Rick Bryant
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Jim Hecker
Ron Rogers
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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-361

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-363

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-330

The City of Cheyenne, Wyoming 82001

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MAYOR
DON ERICKSON

CITY COUNCIL
ROBERT CHEEK
TIM DAILY
WILLIAM ANDERSON
CARL B. CLARK
JEAN CLARK
ANN TRAINOR
W. R. "BOB" SEARSCH
NANCY WILLIE
GEORGE WOTT, M.D.
KENNETH E. ROGERS

MEMORANDUM
OCTOBER 6, 1982

TO Mayor Don Erickson

FROM Tom Kelly, MX Housing Subcommittee Chairman
Will Sanchez, Staff Assistant

SUBJECT Housing Subcommittee Comments on the WNSIS

Thomas Kelly

[illegible] Cheyenne Frontier Days

MX HOUSING SUBCOMMITTEE

WNSIS Comments Report

The MX Housing Subcommittee has completed a review of the Wyoming and Nebraska Socioeconomic Impact Study (WNSIS), particularly as it relates to housing in the Cheyenne and Laramie County areas. We sincerely regret that more time was not available for a more detailed analysis of the data, but we recognize that severe time constraints are associated with this project.

The following comments were developed from our analysis:

353 1. Generally, we believe that problems associated with housing, especially mobile or temporary housing are not addressed sufficiently. In the Summary Section, page 1-1, the effect upon housing is dismissed with the simple observation that additional mobile housing will be needed in Cheyenne. This ignores the severe problems associated with the extension of sewer and water service to the areas in South Cheyenne, and in the County south of the City where mobile housing is and will be concentrated.

2. We are concerned about statements made in Section 1.4.3 of the Summary, Housing Resources, that appear to suggest that some elements of the Cheyenne Area Development Plan be weakened as well as Zoning Ordinance, Subdivision Regulations, City & County Comprehensive Land Use Plans. From the beginning, the Housing Subcommittee has been steadfast in the belief that the Plan be adhered to in all aspects, and that any efforts to by-pass the Plan or existing elements of the development process be resisted.

We have determined with the help of the City Attorney, that relaxation of building codes to accommodate conversion of basement into apartment would require repeal of that section of the Uniform Building Code dealing with such apartments. A local ordinance would probably be required. In addition, relaxation of any zoning standards relating to mobile home parks would require amending the Zoning Ordinance. These alternatives are not reasonable solutions at this early stage and we feel that the existing regulations need to be maintained.

341

359 3. The Committee does agree with the recommendation on page 3-357, part of section 3.0.3.4, Mitigative Measures, regarding a temporary project worker facility. One or more man camps, similar to the type constructed in the Overthrust Area of Southwestern Wyoming, should be a requirement of primary contractors on the Peacekeeper Project. Such facilities would relieve housing demand in the Cheyenne area, and would also reduce some of the impact in activities such as law enforcement, etc. The man camps should be managed as the project winds down with the further requirement that the site be restored, as nearly as possible, to its original, undisturbed condition.

354 4. Because of its proximity to project sites and its location on Interstate 80 and the mainline of the Union Pacific Railroad, we feel that the impact effect on Pine Bluffs has been substantially understated. We realize that this concern probably falls outside of the scope of our original mission, but we felt compelled to bring this to your attention. If problems in Pine Bluffs are ignored, problems in the Cheyenne area could be further aggravated.

357 5. The demand for multi-family housing throughout the period of the project has been under-estimated, we believe. Changing life style and economic conditions have resulted in more and more people opting to live in multi-family surroundings. We believe the trend will continue and be accelerated as a result of population in-flow.

367 6. If WNSIS predictions for mobile home demand is accurate, "62 mobile home units will be required to satisfy the net demand as a result of the project:", page 3-351, it appears that sufficient mobile home park spaces and subdivision lots are either being built or are proceeding through the development process to meet the demand. Our analysis shows more mobile home spaces in the area than the WNSIS report, and figures compiled by the Planning Office in conjunction with some of our committee members reveals that projects encompassing nearly 800 additional spaces are either underway or on the boards (see attachment). Here is our area of greatest concern. Most of these units are planned for the South Cheyenne area, and it is our understanding that South Cheyenne Water and Sewer District is operating at near capacity, with the end result of the 201 Study a long way off. It is obvious that many major problems will have to be addressed in terms of sewer and water service with this massive influx of mobile housing, not the least of which is a major transfusion of revenue from some source. Every problem also represents an opportunity, and this may provide the community with the chance to obtain some major sewer and water grants or impact funds to solve both the short- and long-term problems Cheyenne is facing.

352 7. Cheyenne based contracting firms, and reputable firms in nearby communities should be able to respond to the demands for both single-family and multi-family housing throughout the life of the project. Contractor licensing requirements should certainly not be relaxed, and we believe that the County Commissioners should take steps to adopt some sort of licensing procedure at the County level to discourage fly-by-night operators from moving in and building substandard units on available building sites throughout the County. The regular and associate members of the Southeastern Homebuilders Association will assist with this type of activity. There could be a joint City/County licensing board with financial contribution from the County. If a County Building Inspector is desirable, the County could contract with a professional group for the service rather than increase staff.

379 8. We recommend that reconstruction of wherry housing be phased to permit new units to take the place of any that may be removed from the base housing stock. This approach would not exacerbate the housing situation in the City. We have also determined that a new main water trunk line be installed.

373 9. If the South Cheyenne Water and Sewer District carries through the initial determination of a moratorium as passed at the October 4, 1982 meeting, on further mobile home development, the City should investigate through the Air Force the possibility of working with developers and/or property owners to co-venture temporary mobile home parks in South Cheyenne that could be tied into present water sewer facilities. A task force for this purpose with restricted time limit for a solution may be helpful.

342 10. This project will attract lots of people from other parts of the country. The impact study does not tell us how we are to house these people. The burden will fall on the private welfare services of the community and they will need additional financial assistance to do the job. Congressional appropriation for assistance may have to be sought.

In summary, the impact on the South Cheyenne Water and Sewer District will be almost overpowering. Resources are going to be needed to assist the District. If Federal funds can be obtained, the 201 Study could be implemented at an earlier date.

Congress appropriates the dollars for the systems, the hardware, warheads, bricks and mortar, ect., and they should also provide the dollars for dealing with human needs. This is certainly true for overseas military installations, and should certainly be the case for a project as important as the Peacekeeper Program.

Mobile Home Park Subdivisions Development Status Report

TOTAL NO. MOBILE HOME PARKS	65
TOTAL NO. LOTS IN PARKS	2605
NO. LOTS IN PARKS IN CITY	907
NO. LOTS IN PARKS IN COUNTY	1135
NO. MOBILE HOMES NOT IN PARKS	662 - in county only
MOBILE HOMES AS A PERCENTAGE OF RESIDENCES	
LARAMIE COUNTY	10
S. CHEYENNE WATER & SEWER DISTRICT	64
CITY OF CHEYENNE	2*

NAME	DEVELOPMENT STATUS	NO. OF LOTS	TYPE OF P
Landmore		18	Park
Country West	Being Built	187	Subdivision
Pine Tree Park	Final Plat Submitted	144	Park
Timberline Village	Final Plat Approved	92	Subdivision
Mile High Village	Final Plat Approved	107	Subdivision
Lucas Park	Final Plat Approved	70	Subdivision
Babb II	Pre-Liminary Plat Submitted	28	Subdivision
Trailer Inn	Partially Occupied	77	Temporary P
Adams Estates	Expansion Request Submitted	7	Park

*Total - 165 Park Spaces
287 Subdivision Lots

The City of Cheyenne, Wyoming 82001

CHEYENNE REGIONAL AIRPORT
CHEYENNE, WYOMING 82001
PHONE (307) 637-6251

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MAYOR

CITY COUNCIL

[illegible]

MEMORANDUM

TO: Mayor Jon Erickson

FROM: Tom Kilty and Jeff Sanford, PA Housing Subcommittee

SUBJECT: Comments on the DEIS

Attached are the Housing Subcommittee comments on the DEIS and the comments made at the Public Hearing of November [illegible]

[illegible]

COMMENTS FOR DEIS HEARING

Tom Kilty - Appearing as representative of Housing Subcommittee. Briefly cover few points. Intend also to submit written statement prior to deadline for public comment.

Land Use

1114 In areas of land use, it is assumed that increased demand will have a potential beneficial effect, by creating in-fill of vacant lots. This may be true in the case of isolated lots scattered throughout the urban area where adequate facilities exist and where landowners have sufficient capital to develop or build on the property. We feel it is not the case, however, where the infrastructure is not in place, where costs of development are so great that they cannot be amortized or recovered in any reasonable length of time, if the cost is imposed on a developer or individual landowner, or where the costs are to be borne by the City without substantial impact assistance. This point needs much more evaluation.

Mitigation measures described on page 3-185 are welcome. (Relates to No. 4.)

"Unavoidable adverse impacts", mentioned on page 3-34, are those which our Committee identified as being in the "wind down" cycle, and we believe they are treated too lightly. We will attempt to be specific in our written comments concerning these points, and try to suggest some mitigative measures that can be implemented to lessen the blow when the big work surge is over.

TK:lkh

Comments for Public Hearing

Tom Kilty - Appearing as a representative of Impact Committee formed by Mayor. Housing Subcommittee. Brief statement at this time—intend to submit a written statement containing more information on points mentioned - prior to deadline.

335 1. Generally believe that problems associated with housing have not been addressed sufficiently, particularly with respect to temporary housing, mobile housing, availability of capital for certain types of housing and the concentration of housing in certain areas.

2. We are concerned that some of the draft material appears to suggest that present regulations, ordinance, etc., and elements of the Cheyenne Area Development Plan, Land Use Plan, etc., be modified in order to expedite development. We believe that existing plans and processes should be followed, to the letter, so that even impact development proceed in accordance with community desires in an orderly manner.

324 3. In this respect the Housing Subcommittee believes that a dispersal approach to housing impact is preferable to any plan that would concentrate this impact in one or two areas of the community. Concentration, we maintain, would destroy the objectives of the Cheyenne Area Development Plan, adversely affect the capital improvement plans of the community and show the development of decent, reasonably priced housing in Cheyenne and Laramie County.

320 4. The Committee would support the proposal to have the primary contractor construct a facility to construct one or more "man-camps", for lack of a better name, if it could be designed to serve a worthwhile purpose later such as a senior citizen facility, Junior College dorm, an emergency medical center, or the like. The contractor should be required, however, to either level the site and restore it, if an on-going use cannot be identified, or redecorate and refurbish the facility for community use later. (This relates to comments on page 3-185, Mitigation Measures.)

5. We recommend that reconstruction of Kherry Housing or any other housing on Warren Air Force Base be phased so that the work will not further aggravate housing problems that the community will have to solve. In this regard we feel that not enough attention has been given to plans to improve numerous facilities at Warren, aside from the actual modification of missile sites--that this work apparently will be significant, and that decision-makers be informed of these projects soon so that we can plan for this secondary impact. 148

6. The reports that have appeared to date place heavy emphasis on mobile housing as the solution to housing impact. They overlook in large measure the problem with financing mobile home parks and subdivisions, and the public utilities required for such developments. 327

7. We are very concerned about competition for the materials and skilled personnel needed to build the weapons system and the housing that will be needed in this community and elsewhere. We don't feel that this problem has been reviewed adequately--we feel it's going to be a big problem and we urge military and federal government officials to get together with local government by the private sector soon about these matters. On pages S-ii of Executive Summary, on S-iii, talking about construction resources. 452

We have a few other matters of concern--we have some suggestions for mitigative measures that we feel are viable--and we'll communicate these matters to you in writing before the deadline on public comment.

MC:lkh

-2-

The City of Cheyenne, Wyoming 82001

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MAYOR
DON ERICKSON

CITY COUNCIL
J. ROBERT STOREY
PRESIDENT
WILLIAM ANDERSON
CAROL J. CLARK
JOHN CLARK
JANE CRAWFORD
M. F. MARY DEETSCH
WANDA MACUS
GEORGE SCOTT, III
RONALD A. ROGERS

MEMORANDUM
November 17, 1983

TO: Housing Committee

FROM: Will Sanchez

SUBJECT: Comments on Community Profile

In the time period that has transpired since the development of comments by the Housing Committee for the Community Profile, there have occurred some changes which require clarification or additional comments relating to housing. Specifically, the availability of impact data including the ANSIS Housing Study, clarification of proposed mitigation measures, and the South Cheyenne Water and Sewer moratorium result in the following proposed changes to the housing comments:

A. Conclusion No. 1 needs to be clarified to read:

1. Water and sewer capacity in the City of Cheyenne Corporate Limits IS GENERALLY ADEQUATE TO HANDLE . . .

B. Insert the following conclusion on No. 2 and renumber subsequent conclusions:

2. The South Cheyenne Water and Sewer System has water pressure problems resulting primarily from undersized water mains and a study is needed to determine where the problems exist and what the corrective measures are. Mitigation resources need to be made available immediately to react to the problem in a timely and effective manner.

C. Insert Conclusion No. 3 and renumber subsequent conclusions.

3. There is a very serious problem of availability of mobile home "parking stalls" - (mobile home parks) that is freezing the current opportunity to provide mobile home units as a viable housing alternative. The market reaction is to provide mobile home "subdivisions" that are intended to be sold and not rented. These developments are also being concentrated in the South Cheyenne Water and Sewer District.

THE HOME OF CHEYENNE FRONTIER DAY

D. Change No. 16 to be more inclusive of other reports such as ANSIS and ANSIS Housing elements or "drop it" altogether as being inappropriate for the Profile.

E. Add to No. 16. The need for policy direction with respect to housing needs to be part of the mitigation planning effort. This need has been recognized and is being implemented.

F. Add these additional comments as conclusions:

4. There is a groundwater problem developing in the north sector of the County adjoining the Cheyenne Corporate Limits and there is a large oversupply of undeveloped lots in this area. Development of these lots will exacerbate the problem. A clear policy relating to additional platting, standards for future development, and mitigation measures to protect the current water users in the area needs to be addressed by the decision-makers. 319

5. Competition between private housing development and MX development is anticipated and there is a need to evaluate the situation and to implement appropriate mitigation measures to prevent barriers to private and MX development.

6. There is no provision of temporary housing for transients in Cheyenne and those providing assistance with respect to providing food are already having difficulty. It is anticipated that there will be a tremendous increase in this population and identification of temporary housing for transient individuals or families along with facilities for feeding them should be a mitigation measure addressed by the Air Force.

WDS:lkh

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COMMUNITY PROFILE

MX HOUSING COMMITTEE

Since the development of the Committee there have been meetings held on a regular basis to define housing policy, needs, conditions and impacts that may be generated by deployment of the MX Peacekeeper Missile in Cheyenne. The following is a summary of the conclusions that have been reached through our analysis process.

CONCLUSIONS

1. Water and sewer capacity in the City of Cheyenne Corporate Limits is generally adequate to handle MX demand if additional filtration is provided. There may be some problems in certain areas.

2. The South Cheyenne Water and Sewer System has water pressure problems resulting primarily from undersized water mains and a study is needed to determine where the problems exist and what the corrective measures are. Mitigation resources need to be made available immediately to react to the problem in a timely and effective manner.

3. There is a very serious problem of availability of mobile home "parking stalls" - (mobile home parks) that is freezing the current opportunity to provide mobile home units as a viable housing alternative. The market reaction is to provide mobile home "subdivisions" that are intended to be sold and not rented. These developments are also being concentrated in the South Cheyenne Water and Sewer District. 319

4. New additional housing on the base will require a new water trunk line.

5. Southwest corner of the urban area is only sector where sufficient water could not be provided for new housing.

6. Controls are needed to prevent overbuilding of all types of housing.

7. Temporary housing located near to the construction sites is a desirable solution.

8. Financial resources can be identified and made available for new housing if the market will accept the interest rates.

9. If a "man-camp" is the mode of temporary housing used, then the camp should provide its own recreational facilities and police protection.

11. A regulation to control multiple use of housing units by groups of families or individuals may be needed.

11. There is a serious floodplain problem in South Cheyenne that may preclude mobile home parks in certain areas.

12. The placement of housing near the college that could later be utilized for college student housing was not found to be a desirable nor acceptable approach.

13. Construction firms wishing to participate in housing construction will have to be licensed and quality control within the City will be done under the Uniform Building Code. There are limits in that the Code deals with life, health, and safety provisions.

14. The County does not have any building codes and there is a need to establish some. Only commercial buildings in the County may be inspected by the State Fire Marshall.

15. It was determined that a significant portion of the housing on the base is sub-standard by current code and that it needs to be replaced. While there is adequate infrastructure in the south-western sector of the base to permit new housing construction, it appears that the base officials prefer to develop the new housing as an integral part of existing housing areas and to integrate it into the north Cheyenne development scheme. **319**

16. Housing development as the result of the MX needs to be handled within the existing framework of local ordinances and regulations. Policies and plans that have been developed, including the Annexation Policies and the Cheyenne Area Development Plan must be followed.

17. A concern that evolved throughout the process of review was that the basic information relating to housing inventory, stock, etc. was not available. As a result, a request for a comprehensive housing study was made. The Air Force is doing this and the study will provide the base line data to make proper decisions and direct policy development. The need for policy direction with respect to housing needs to be part of the mitigation planning effort. This need has been recognized and is being implemented.

18. There is a groundwater problem developing in the north sector of the County adjoining the Cheyenne corporate limits and there is a large oversupply of undeveloped lots in this area. Development of these lots will exacerbate the problem. A clear policy relating to additional platting standards for future development and mitigation measures to protect the current water users in the area needs to be addressed by the decision-makers.

19. Competition between private housing development and MX development is anticipated and there is a need to evaluate the situation and to implement appropriate mitigation measures to prevent barriers to private and MX development.

20. There is no provision of temporary housing for transients in Cheyenne and those providing assistance with respect to providing food are already having difficulty. It is anticipated that there will be a tremendous increase in this population and certain [illegible] temporary housing for transient individuals or families with facilities or feeding them should be a mitigation measure addressed by the Air Force.

ADS:lwh

mayor's impact team

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MEMORANDUM

TO : Mayor Don Erickson

FROM : Intergovernmental Subcommittee - Impact Team

DATE : October 12, 1983

SUBJECT : REVIEW - COMMENTS ON THE WNSIS

The Intergovernmental Subcommittee met on October 5, 1983, to review the WNSIS Document and to prepare a response for transmittal to the Air Force.

The Subcommittee's review resulted in two major concerns. The first was that the WNSIS Document looked in detail at only one of many possible housing scenarios: The placement of the majority of the temporary labor force in mobile or temporary housing in the south Cheyenne area. This option presents many problems for the local governmental units involved in terms of providing the necessary infrastructure improvements including water, sewer, drainage, police and fire protection, transportation, and recreation. Some additional work needs to be done in analyzing the options open to the community and the governing bodies in regard to housing. It is doubtful that the private market would be able to adequately meet the housing demand and provide for a reasonable rate of return on its investment.

The committee recommends that the decision about location of housing units as well as type should be considered a variable and alternative scenarios should be analyzed. For example, the necessity for providing contractor incentives or housing provided by the project contractors in a site more suited to residential development. Other options which could be explored include: joint ventures between the City and the College, the City and the Federal Housing Authority, greater utilization of temporary housing available in Pine Bluffs, Burns, Albin, and other communities in the County, increasing the number of immigrants living in Wheatland where housing is readily available. We are sure other options could also be implemented utilizing the legitimate powers of the governing body. It must also be noted that any analysis of these options must consider the legal and traditional governmental policies regarding interference in the free enterprise system. **360**

Recommendation No. 2 is a direct result of recommendation No. 1. **Local governmental officials be provided with a WNSIS and a training seminar which outlines the various policy options available to the governing bodies and gives them some indication of what the effects of these options would be on the impact.** It was determined by the committee that the local elected officials were absolutely key to the development of a rational housing program including revised mobile housing standards and provision of infrastructure improvements. These decisions, as well as other necessary policy actions, must be taken by the governing body with some understanding of the effects that these decisions will have on the ability of the community to mitigate impacts. **96**

Mayor, as you can see from these recommendations, the Intergovernmental Committee confined itself primarily to policy issues which must be addressed by the local governing units. It is our opinion that these policy decisions are absolutely essential and that one of the key purposes of a document such as the WNSIS is to provide officials with the necessary information and options to guide their decisions. Given this objective, the WNSIS Document, while providing much useful information, does not go far enough in analyzing and suggesting policy it does not review the broad impacts resulting from the scenario currently outlined in the WNSIS and does not present options as to how policy decision or alternatives might effect this projected impact.

The Committee intends to continue to review the next draft of the WNSIS and follow-up documents including reports of the other Impact Subcommittees and the Draft EIS with the intergovernmental policy decisions as paramount concerns. However, it cannot be over emphasized the role of the local elected officials in this process is central and their understanding and proactive approach to addressing these impact problems will be a major factor in how well the community copes with or benefits from deployment of the Peacekeeper in this area.

The City of Cheyenne, Wyoming 82001

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MAYOR
DON ERICKSON

CITY COUNCIL
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PRESIDENT
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CAROLE CLARK
JOAN CLARK
JANE CRAWFORD
M. P. "MARY" DEITSCH
WANDA MCCUE
GEORGE SCOTT, M.D.
RONALD N. ROGERS

MEMORANDUM
October 11, 1983

TO: Mayor Don Erickson

FROM: Land Use Subcommittee of the IMPACT Team

RE: Comments on the Wyoming and Nebraska Socioeconomic Impact Study

Comments on the Wyoming and Nebraska Socioeconomic Impact Study

Land use Subcommittee of the IMPACT Team

After reviewing the WNSIS, and comparing individual concerns, the Land Use Subcommittee has the following comments on the document.

Several specific concerns were raised. Those are:

634 On pages 3-9 and 3-82, completion dates for the law enforcement facility are estimated for 1984 or 1985. Officials from the National Institute of Corrections in Boulder, Colorado have noted that the average planning period for a law facility is 48 months. It is doubtful that a new facility will be occupied in Laramie County in 1985. Discussion of this, and mitigation measures should be included in the WNSIS.

Discussion of the County Zoning Office (page 3-10) does not include discussion of possible changes in the local policies in regulations. For example, a recommendation for the Zoning Ordinance might be better enforcement. This would require a larger staff. Thus, the present staff would be inadequate. Mitigative measures for both the County (page 3-12) and the City (page 3-48) recommend joint usage of microfilm. A joint 781 Zoning Office and a joint Engineering Office are also possibilities. In the City mitigation, overtime work is an unfair recommendation. On page 785 3-48 the "City" Planning Office should be changed to the "City/County" Planning Office.

361 On page 3-340, a 500 space mobile home park is mentioned. There are presently no applications in the Planning Office for this proposal. Speculative developments should not be included in the WNSIS.

362 On page 3-342, a comment is made that transient workers will not live in motels/hotels during Frontier Days. Where will they live? In the discussion of motels/hotels on page 3-351, there is no mention of a possible loss of tourism to the area because of a lack of vacancy during the impact period. In addition, isn't it possible that rates may increase 355 as a result of the increase for demand? Wheatland does have facilities to handle increased housing. How are people going to be encouraged to move there instead of to Cheyenne? (page 3-357)

797 On page 3-26, the LCCC library funding is provided by the state, and 799 only approved by the Community College Commission. In addition, the general impact to LCCC will probably be greater than the WNSIS indicates.

1453 The mitigation on page 10-61 for no increase in the level of fish and game law enforcement is not appropriate without the documentation.

General concerns are as follows:

956 The entire discussion of South Cheyenne is not adequate. If most of the population is projected to live in that area, discussion of all the impacts to the area should be specific. The mitigation measures should also be better than mitigation for areas with less impact.

There are several recommendations for different types of housing, including man camps. There are no recommendations for funding of the facilities, or who should provide them. In fact, the WNSIS mentions that 359 the Air Force will not provide the housing. In other cities where private industry creates large population impacts, the industry is expected to provide housing. The Air Force is creating the impact to Cheyenne, so they should be expected to provide some housing.

379 Another housing concern is related to the rehabilitation of housing on the base. If housing is to be rehabilitated during the next few years, where will the displaced people live, and will they cause an additional strain upon the housing market?

351 There should also be some discussion of the general planning process. It will be impacted by the increase in demand for new housing, and it is probably not capable of handling all of the impacts smoothly. Policies and regulations should not be made less stringent to accommodate new housing. They should be upgraded to insure that new housing is of high quality.

618 The impact upon the school system is not clear. Construction for MX is scheduled for 1984, but there is no projected impact on school enrollment until 1985-1986. The School District needs to know specific times to expect enrollment increases, so they can adequately plan for the impact.

1219 Open space around schools is mentioned as a part of the City's recreation program. This is the case, but much of the space is not developed. The Parks and Recreation Department also uses many of the School District's indoor facilities for their recreation programs. There is no mention on the impact the School District will receive from additional use of these facilities.

756 Most of the social service agencies in the County are operating at 763 capacity now. The WNSIS indicates that most will continue to operate as they do now. This will cause some displacement of people receiving services. In addition, when recommendations are made for the increase of services, there is no mention of the method used to fund the increase.

938 In the discussion of Solid Waste Disposal, there is no mention of methods for increasing service outside of the City. Since there is no mandatory pick-up in the County, increasing service by public garbage haulers, will not necessarily increase the trash pick-up outside of the City.

The population projections in the WNSIS are not the same as similar projections prepared by DEPAD. The projections prepared by the state estimate less population impact. There is concern that with the higher projections, overbuilding will occur as a result of speculation.

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In the discussion of Pine Bluffs, Burns, Albin, and other communities in eastern Laramie County, the impact is projected to be minimal. The Land Use Committee questions this conclusion.

All of the mitigation recommendations are too general. They need to be more specific and also stronger, in order to be effective. The specific 99 needs including staff, space, etc., and especially the possible funding sources need to be identified.

Consideration needs to be given to the possible loss of industry which would benefit Cheyenne more than the development from MX. Some industry 286 may not locate in Cheyenne because of the high demands on services which will be present during the impact period. These industries, if they had located in Cheyenne, would have had a larger long-term benefit to the region. Other growth issues, including industrial growth in other cities, and changes in the growth patterns need to be included.

The community profile on land use, prepared by the Land Use Subcommittee contains several other issues which were not addressed in the WNSIS. Those were: An analysis of the policies and regulations necessary to guide development; the inadequacy of City and County roads and the maintenance policies for them; the inadequacy of the South Cheyenne Water and Sewer District to handle large increases in demand; the overlap of City/County boundaries which creates confusion in the provision of public services, and finally the entire "bust cycle" which will occur when the project is completed. The issues are more clearly explained in the profile.

86 In conclusion, the Land Use Subcommittee recommends that a coordinating council be formed which can monitor and up-date all information supplied for the MX project, and that funding be supplied for the creation of that council.

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-332

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-332

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The City of Cheyenne, Wyoming 82001

MAYOR
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CITY COUNCIL
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WILLIAM ANDERSON
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MARY DEATSCH
WANDA MCCUE
GEORGE SCOTT REID
RONALD N. ROGERS

November 18, 1983

MEMORANDUM

TO: Land Use Subcommittee of the IMPACT Team

FROM: Maury Plambeck MP

RE: November 17th Meeting

The Land Use Subcommittee met for breakfast on November 17, 1983, with the following persons present, Tom Cole, Jim Brady, Sandra Donovan, Steve Acnter, Buck Holmes, Phil Rosenlund, and Bob Storey. The purpose of the meeting was to finalize the written comments on the Draft Environmental Impact Statement.

I have attached a copy of our comments. If you have any additional comments, or feel that I missed some points, please let me know by Tuesday, November 22. The comments will be mailed to the Air Force late next week.

MP/gs

cc: Tom Bonds
Sue Murray
Julie Kjack

PRELIMINARY DRAFT

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Land Use Subcommittee of the IMPACT Team

Tom Cole, Chairman	Donelle Fenwick
Jim Brady	Buck Holmes
Mrs. Sandra Donovan	Art Reese
Steve Acnter	Phil Rosenlund
Bob Storey	Maury Plambeck, Staff

The Land Use Subcommittee has the following specific concerns about the DEIS. These comments are follow-up to the general comments made at the public hearing on the DEIS. Most comments are related to the Land Use section of the document, but these are also general comments about other sections.

1116 A major concern is related to the definitions of levels of impact for Urban Land Use. By definition, there can be no major impact on land use. The mere existence of development controls does not mean they are adequate. The controls could be outdated and poorly written (zoning ordinance, for example). The controls may not be implemented as designed. Those factors could have an effect on land use in periods of high growth.

1119 The committee is also concerned about the definition of "underutilization of developed land". Three definitions were considered:

1. Land which is vacant, but is developed with street, curb, and gutter, and water and sewer lines.
2. Land which has improvements (buildings, etc.) but which is poorly maintained and not utilized for the purpose for which it was designed.
3. Land which has improvements, but which is better utilized in a different use. (high density residential, instead of parking lot, for example) Which definition, if any, is appropriate?

1120 The definition of vacant land is unclear. Does vacant land mean all land that has no development? Are utilities provided to vacant land? The committee agrees that there are many acres of vacant land available for development. Some of this land, however, was platted many years ago and may not be suitable for development. Topography, streets/roads, and availability of public services are all constraints to development, and need to be considered in the evaluation or vacant land. In addition, the committee

DEIS COMMENTS
Page Two

1120 feels the statement that the supply of vacant land will stay constant is incorrect. If infill does occur, some of the vacant land will be utilized. Land that is annexed to the City is usually developed soon after.

1121 In description of the baseline future for Cheyenne, the acreages should be better documented. (Which zones/lot size requirements were used to determine the break-down of residential needs?) The assumption that current housing preferences and lot size requirements will continue may be inaccurate. As housing costs increase, the trend may be 326 for small houses and smaller lots, or the trend may change to more attached housing: What effects would possible changes have?

1122 Infill would be a potential positive impact, but there needs to be some incentive for the development of infill properties. A major reason for undeveloped areas surrounded by City is the cost of development. Major expenditures are necessary to provide streets and water and sewer lines to these properties. The acreages are often too small to allow development which would regain these costs. In order for infill to occur, direction should be given to allow for incentives to develop these parcels. If there are no incentives, cheaper land, which is farther from the City, will be developed first.

1123 In the proposed action section for urban land use, the acreages projections need more documentation. The projections may be correct, and are probably based on projected types of people moving to Cheyenne. The numbers should be proven.

1124 Also in that section, the discussion of underutilization is unclear. How will the underutilization or single-family uses be absorbed by 1990? If underutilization of mobile home uses will last past 1990, wouldn't that be a long range impact on land use?

1125 The committee is also concerned about the reference to future annexation of vacant land. Much of the land prioritized for annexation in the policies is not desirable for annexation until City boundaries reach those areas. (Priority 3 areas, for example)

1126 Another issue raised was about alternative R3. If a new interchange is built at I-80 and Round Top Road, growth will occur in that area. This is not recommended for major growth in the Cheyenne Area Development Plan until areas which are closer to the City are developed. The alternative would cause significant impact because there

DEIS COMMENTS
Page Three

1126 would be land development which is inconsistent with adopted plans and policies.

Rural Land Use considerations were also raised by members of the committee.

1099 The DEIS does not discuss areas that are not in organized fire districts. Additional people in rural areas will increase the potential for fire in those areas. If the fire control systems are not upgraded, damage to life and property could result.

1100 The people that live in the rural areas or the project should also be given more consideration. The assumption that the population will not be large in those areas may be accurate, but it should be documented. There would be impacts on their lifestyles. For example, increased traffic resulting from the daily commuters, might be an impact which could change the working patterns of some ranches and farms.

1134 Road construction is also a major issue. If it is possible, some committee members would like to review a plan of all roads which are to be upgraded. There is no mention in the DEIS of erosion and sedimentation control in relation to the construction of new roads. The soil in this area is highly susceptible to wind and water erosion. 1464 There are also areas in the county which have not had soil surveys completed. Some soil types would allow only certain types of development.

1138 A major impact noted for rural land use seems to be the installation of new underground cables. The land use committee wants to reinforce the idea that this process could interfere with the present farming and irrigation operations.

1135 In its discussion of the mitigation measures for urban land use, the committee was interested in "standard assumed Air Force mitigations". What are these? The committee also feels a temporary project worker facility should be provided by the Air Force. It would be illogical to have that type of facility provided by private development. Two 314 suggested areas were housing which could be later used by Laramie County Community College or the old Johnson Jr. High, which could later be used for rental housing or for neighborhood services offices.

DEIS COMMENTS
Page Four

1108 The committee feels that a monitoring program is important, but it won't be effective unless implemented before major problems have occurred. The committee also recommends that all monitoring be coordinated with the Required Planning Office.

1096 The mitigation measure for mobile home parks was also discussed. In theory the idea is valid. Some problems could arise in approving mobile home parks that are required to change at a future date. Conditions in the future could change which would make the developer want to keep the mobile home park indefinitely. Neighbors may accept a mobile home park if it were to be only temporary, but they would feel slighted if the park remained after the time limit. There may be pressure to accept mobile home parks, without requiring all standards, when the park is to be only temporary. It is recommended that the mitigation not make future reclamation of a park mandatory. Mobile home parks should be approved, subject to the appropriate standards, without time restrictions. Reclamation of the park could be left as an option for the developers.

89 Funding is a major mitigation measure that has not been included in the DEIS. The committee requests that specific funding allocations and associated projects be listed for review. There are many areas where impacts cannot be handled, if there is not appropriate funding for increased services. Some examples are: upgrading of water and sewer service, especially in the South Cheyenne Water and Sewer District; upgrading the transportation network; increasing both fire and police protection; and solving several drainage problems which are likely to become more severe, as a result of increased development. Funding is necessary to implement existing plans, to develop necessary policies, and to coordinate planning efforts among all jurisdictions effected.

1127 A final general land use concern was that as a result of the present moratorium on taps in the South Cheyenne Water and Sewer District, there will be increasing pressure for development in other areas. It is desirable for housing to be dispensed, but all new housing should be well developed. If it is perceived there is an immediate housing shortage when these proposals are in the approval process, there is a chance developments could be approved when they do not meet all standards. This problem could cause a large impact on land development in the area.

DEIS COMMENTS
Page Five

315 The Land Use Subcommittee also had several comments on the housing section. The first comment deals with the "1990" date at the end of the analysis. Will there be no impact after 1990? What will happen to the excess supply of housing noted on the chart on page 3-24? Why don't the 316 impacts for single-family use exceed a five-year period?

334 The committee disagrees with the reference to negligible impact on motel and hotel rooms and campground spaces. Other documents (WNSIS) have indicated that all vacancies will be filled by people related to the MX project. If that is the case, the traditional tourist trade will be greatly impacted, because tourists will have no place to stay during the project period.

89 The mitigation measures, as presented, will solve no problems. These are only the beginning of effective mitigation. Policies must be adopted, and funding must be appropriated to create specific solutions.

The Land Use Subcommittee has submitted those comments to aid in the creation of the Final Environmental Impact Statement. We hope the comments are constructive, and we thank-you for the opportunity to comment.

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The City of Cheyenne, Wyoming 82001

MEMORANDUM
October 7, 1982

TO: Mayor Dan Erickson

FROM: John Barnett JB

SUBJECT: Comments on the wNSIS from the Rec Recreation Subcommittee

Over the course of several subcommittee meetings the Recreation Subcommittee developed its comments on the wNSIS. While much of the information is valid, there are some problems, particularly when it comes to quoting City Standards for parkland within each neighborhood as well as a rather limited and largely ineffective set of recommendations for mitigation.

The comments are discussed in more detail below.

1220 The Greater Cheyenne Recreation Commission has adopted a policy that there should be 5 acres of park and within each neighborhood for each 1000 persons. The wNSIS misquotes this by stating that standard is 5 acres for each 1000 persons in a 1/2 mile. Even half the existing park and is located in one park in one neighborhood. Several outlying neighborhoods have little or no park and few neighborhoods received extensive growth during the early 80's. Any assessment of the impact of which was not stated. It is clear that the City has adopted a follow-on standard of 3 acres per 1000 population and then state that we meet that. Failure to understate the existing park needs to justify our park plans. This standard is misquoted through out the wNSIS and it is used as a basis for several conclusions.

1218 [illegible] parks and the wNSIS includes schools included in its park facilities within one based. While facilities are used by [illegible] leagues and are not owned by the Laramie [illegible] the Greater Cheyenne Parks and Recreation District does not believe these [illegible] park and facility criteria.

1214 [illegible] and that we will be applying [illegible] park and park facility needs as we [illegible]

1214 The wNSIS accurately points out that the City park system has many facilities in it and that additional facilities will be based on the 5 acres within the existing system may detract from the usefulness of that system by overloading it and presenting additional maintenance burdens.

6. It should be pointed out that there is a severe shortage of bicycle and pedestrian facilities in South Cheyenne in particular, in the light of that area receiving by far the impact of the projects with no recreation facilities or adequate

1073 mitigation for South Cheyenne. Many new jobs are the projects will want to go into the City to use recreation facilities probably by bicycle.

990 In addition, there is currently a problem with school bus stops. School buses will only stop along maintained subdivision streets. Most streets in South Cheyenne are unpaved and many are private. Thus school bus stops tend to be along major thoroughfares such as South Greeley Highway. The result is school children waiting and walking along these major thoroughfares.

Major improvements are needed for bicycle and pedestrian facilities within South Cheyenne.

1234 South Cheyenne, in addition to lacking parks and bicycle facilities, according to the wNSIS, is in need of 101 acres of park and 3 baseball fields, 3 softball fields, 3 basketball courts, 4 volleyball courts, and three tennis courts. Recommendations for specific facilities be [illegible] master plan on which be based on [illegible] of the goal of [illegible] the wNSIS.

1233 While [illegible] of this impact of MX development is particularly South Cheyenne, the area already has poor infrastructure, due the restrictions to upgrade and maintain existing [illegible] structure, and not adequate mitigation activities are proposed.

1227 The section [illegible] appears adequate with the exception [illegible] be made that these facilities are [illegible] the needs [illegible]

1222 The wNSIS notes that Denver [illegible]

1186 The mitigation measures proposed in the wNSIS offer little that is new. They are either being done now, have been considered and rejected, or have been considered for some time.

1232 The mitigation strategy should include consideration of how to develop parks and recreation facilities and pedestrian and bikeways in South Cheyenne. This would include consideration of combining benefits such as reclaiming gravel pits, using flood detention areas, or other means. In addition, provision must be made for providing funds for maintenance as well as carrying it out.

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The City of Cheyenne, Wyoming 82001

MEMORANDUM

JB

1183 [illegible]

1184 [illegible]

TO: Major Peter Walsh
FROM: John Barnett - 2 - November 25, 1983

3. South Cheyenne faces substantial growth with inadequate bicycle and pedestrian facilities, little public open space, and no mechanism to provide and maintain these facilities. It is pointed out that the area is in need of 30.2 acres of parkland. There is little thought given to the significance of this. 1185

4. Park maintenance in Cheyenne costs the City approximately $1900 per acre per year. Without extensive volunteer efforts for parkways and athletic complexes, this cost would increase by approximately 25%. 1181

5. The Parks and Recreation Department currently has less than three thousand square feet of inside storage space. It is felt that some 36,300 square feet of space is needed to accommodate their needs. Because of added demand placed on maintenance from MX impact, this space is even more important. 1182

6. The proposed mitigation measures offer little that is new. They are either being done now, have been considered or tried and rejected, or are currently being considered.

Of particular concern is timely mitigation assistance. Mitigation strategies must be more specific and better defined. It should include consideration of how to develop and maintain parks, recreation, bicycle and pedestrian facilities in South Cheyenne. In addition, provision must be made for funds for maintenance as well as development. 1186

JB:cb

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-331

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-334

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The City of Cheyenne, Wyoming 82001

DON ERICKSON
CITY COUNCIL
ROBERT LITTRE-
JAMES DEAN
WILLIAM ANDERSON
CAROL J. CLARK
JOAN CLARK
JANE CRAWFORD
H. B. MARY GERTSON
WANDA MOCK
GEORGE SCOTT, M.D.
RICHARD V. ROGERS

MEMORANDUM
NOVEMBER 1, 1983

TO : Mayor Don Erickson

FROM : Those interested in the Transportation aspects of the MNSI

SUBJECT: Comments regarding the MNSIS

Contents

Section A - Comments from the MX Transportation Subcommittee

Section B - Specific Comments from the City Traffic Engineer

Section C - Specific Comments from the Director of Streets and Alleys

Section D - Specific Comments from Airport Manager

BJC:ch

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THE HOME OF CHEYENNE FRONTIER DAYS

SECTION A

Comments from the WX Transportation Subcommittee

1037 The entire transportation model and resulting traffic projections, both with and without the project, are predicated on the assumption that most future residential development will occur in areas noted in Figure No. 3.2.10-4. Should current or future land use and/or annexation policies or considerations relative to the provision of public services direct future residential development to areas different than those indicated in the WNSIS, the resulting traffic projections and recommended mitigation measures would have to necessarily be modified.

1054 The 1985 estimated project related peak-hour traffic volumes are distributed very heavily on the Interstate system and South College Drive. As a result, the major thrust of the mitigation measures is directed toward these areas. Both the Dell Range Boulevard and Pershing Boulevard corridors may require far greater attention should the northern and eastern parts of the urbanized area experience greater

1059 growth than that assumed by the consultants. Even though the 1985 estimated project related peak-hour traffic volumes are distributed heavily in the South Cheyenne Area, mitigation measures in this area appear weak or absent. Pedestrian safety, particularly the safety of school children, has not been addressed for South Cheyenne Area locations which are projected to experience major increases in traffic.

1073 Section 3.2.10.3.4 notes that no mitigative measures are required due to the negligible impact of the project on pedestrian and bicycle facilities. This is not consistent with traffic projections indicated in other sections of the document. Similarly, level of service reductions at key locations in the South

1003 Cheyenne Area have not been addressed nor have transportation system management techniques or capital intensive projects been listed that would have a mitigating effect at such locations (College Drive I-25, College Drive Parsley Boulevard, College Drive Walterscheid Boulevard, Fox Farm Road/South Greeley Highway, Fox Farm Road/Avenue C).

1071 Section 3.2.10.2 of the WNSIS dealing with public transit indicates present levels of service, but fails in proposing ways that transit might be used as a TSM technique. Obviously, in an auto-oriented urbanized area, use of transit to construction locations will not occur if left to personal choice. A mitigative measure should be advanced which would require transit use by construction workers. This type of mitigative measure would appear to be more realistic in light of an apparent reluctance to make many capital investments in transportation facilities.

Section 3.2.10.3 deals with transportation issues in Laramie County. Within that Section it is noted that one mitigative measure relating to roads would be

1046 extraordinary maintenance where increased construction traffic might cause unusual road deterioration. It has been pointed out by subcommittee members that the word "maintenance" may be inappropriate and that "substantial upgrading" would be more in line with the proposed activity.

1061 In addition, the WNSIS fails to delineate future maintenance responsibilities for both the Interstate and Nonsite routes nor indicate cost estimates associated with maintenance programs.

SECTION B

Specific Comments from City Traffic Engineer

The Traffic Engineering Department has reviewed the Transportation Section 3.2.10 of Volume 2 and basically agree with the mitigation measures as stated in Section 3.2.10.2.4. These mitigative measures are on Page 3-146 and 3-156. We concur that the capital intensive projects should be done to mitigate the impact that will be caused because of the increased traffic on the City's street network. After reading this Manual and investigation these projects, we have set up a priority that we feel should be implemented.

The number one priority we feel in the City of Cheyenne, as a result of the impact, will be needed improvements to Pershing Boulevard. There are two sections on Pershing Boulevard that will be especially impacted and these include the Randall Avenue interchange and the corridor from Pioneer Avenue to Evans Avenue on Pershing Boulevard.

The Randall Avenue interchange at I-25 needs to be redesigned and the traffic signalization needs to be upgraded. Traffic signalization would include a new controller that will enable special phasing and overlaps to occur as well as handle inbound and outbound traffic.

As stated in the report, Section 3.2.10.1.2, improved circulation needs to be set up within the City on the traffic network system. As a result of this, the new traffic signals at Randall Avenue interchange and I-25 need to be interconnected to the new master computer traffic control system that the City is presently installing. This will enable the intersections at I-25 and Randall Avenue to be coordinated with other

999 signalized intersections in the City.

The second location with a priority number one rating is the Pershing Boulevard corridor from Pioneer Avenue to Evans Avenue. It is felt that this is a very high priority because at the present time traffic is becoming congested with increasing capacity problems during the peak hours for traffic going to and coming from Warren Air Force Base. Because Pershing Boulevard will be one of the most impacted arterials within the City, the impact will increase the traffic to a point where there will be unacceptable capacity problems with poor level of service causing unreasonable conditions at times. Along with this there will be delay and several accidents and a large number of stops. Therefore, this corridor on Pershing Boulevard is rated as a number one priority.

We, therefore, recommend that as part of the impact funds, there be set up to improve and redesign the intersections from Pioneer Avenue to Evans Avenue on Pershing Boulevard. In addition to a redesign of geometrics, improved traffic signalization is needed to the point where special turning movements can be set up with more than two phase operation of these intersections. In order to have multi-phasing and over-all smooth operation of these intersections, the timing sequences will have to be coordinated so that more than two phases will be permitted in each of the peak hour periods. Also, to improve circulation as much as possible, a signal at the 21st Street intersection is recommended in order to improve the circulation and to have better control of traffic coming and leaving Old Evans Road to the downtown area. The traffic signal is being planned for Old Evans Road to be interconnected to the master computer that is being planned in the downtown area.

was stated in Section 3.2.10.1.2, that circulation is a problem and we feel that the impact of a peacekeeper makes it even more necessary that continuity and better circulation be set up. This problem can be largely mitigated by interconnecting traffic signals to the computer downtown. Signals will require an interfacing unit. In addition, funds will be necessary to develop new timing plans not only for Pershing Boulevard, but for the Cheyenne area because of interconnection.

There is one more section on Pershing Boulevard that will be impacted and needs to be mitigated. It is the intersection of Logan Avenue and Pershing Boulevard. It is felt that this complex intersection will be impacted and some type mitigation through improved traffic signalization is required. In addition, this signal also needs to be interconnected to the downtown master control computer.

Priority number two for the capital intensive projects include several areas. Some of these are listed in the mitigation measures section and some are not. The first area is a corridor on Lincolnway from Snyder Avenue to Missile Drive with special emphasis on the Deming/Ames intersection. Included with this

999 corridor is the intersection of Missile Drive and 19th Street/Happy Jack Road. We feel this will be heavily impacted and, therefore, recommend that this be a high priority including improved geometrics at the intersections of Ames, Deming and Lincolnway and at Missile Drive, 19th Street/Happy Jack Road. We also feel that traffic signals will be required at Missile Drive and 19th Street/Happy Jack Road. The reason is because of the proximity of this intersection to the Warren Air Force Base. Missile Drive will be a major connector to the Base from the downtown area with heavy volumes of traffic using this artery. At the intersection of Missile Drive and 19th Street/Happy Jack Road, traffic has been increasing. In addition, accidents have also been increasing to the point where traffic signals will be warranted in the near future, with the increased traffic anticipated because of the peacekeeper missile on Missile Drive. It is felt that the accidents will increase even more at this intersection of Missile Drive and 19th Street/Happy Jack Road to the point where traffic signals are warranted.

One location that deserves a very high priority and is not listed on the capital

1057 intensive projects is the intersections of I-25 and College Drive. As stated in the report, level of service will drop from an A-level service down to a D or an F, which is an unacceptable level of service. Therefore, mitigation is required at this interchange, including improved geometrics and possible signalization.

Priority number three is listed in the capital intensive projects Section of Page 3-156. This is a corridor of Logan Avenue from Pershing Boulevard to Lincolnway. We agree that these intersections will be impacted and that mitigation is needed. The intersection of Logan and Lincolnway will be especially a problem because of the high volumes that run through this intersection at the present time. With additional traffic from the impact, improved geometrics, special phasing and turning movements will be required. This includes the installation of left turn

1051 lights and left turn phases. This will also be the case at the two intersections of 19th and Logan and 20th and Logan in that special turning movement phases will be required because of the increased traffic. There are two intersections on the Capital Intensive project lists, Page 3-156, in which we feel the impact does not require any new modification to these intersections and should be deleted. The two intersections are:

1. 19th/Cheyenne-Pershing - This area has just recently been upgraded by the City of Cheyenne using 1% Sales Tax money and is running at a high level service at the present time.

2. Windmill and Dell Range - This intersection currently is under construction and the new intersection will have a much higher capacity and will be able to handle more traffic providing a high level of service.

1051 Therefore, these two intersections should be deleted from the capital intensive projects on Page 3-156.

Priority number four includes three intersections that currently have poor level services, as reported in the report figure 3.2.10-12. These intersections include Lincolnway and Morrie, Lincolnway and Nationway and Lincolnway and Converse. We feel that improved signalization will be required at these intersections. This includes multi-phasing for special turning movements, which would include more than a two-phase operation.

Another area with a very high priority in which impact will be felt is in the school safety and pedestrian safety area. It is felt that because of the impact, additional crosswalks, signing, marking and traffic control will be required in the residential areas where children are walking to and from school. We feel that funds should be set aside in order that plans can be developed for safe walking routes for children and the funds would also be used to set up crosswalk signs and all traffic control. In addition, funds need to be set up to determine exactly what type of traffic controls are required in order for the school children to safely walk to school. For example, at certain locations a traffic signal/school crossing may be required.

Another area in which the Peacekeeper missile will impact the City of Cheyenne is in our bikeway and bike paths. We feel that funds need to be set aside in order that additional signs and markings can be set up in residential areas to aid the bicyclist when going from the residential areas to recreation areas. Again, this will include signs, pavement markings and other traffic control, as well as funds to plan new bike routes and bike paths.

Another area in which the Peacekeeper missile will impact the City is in the area of sub to transit. It is unknown if the WNSIS Study included shopping trips, recreational trips, etc., when considering the need for additional public transit. It is a feeling of the Traffic Engineering Department that transit definitely needs to be considered for shopping and recreational purposes. This would be for construction worker family members that would be living in residential areas and making trips to shopping centers, parks and other areas. We, therefore, recommend

1020 that funds be set aside to make additional studies about public transit for not only work related trips, but also non-work related trips. This may have been included in the WNSIS Study, but is not clear.

The following is a summary of recommendations from the Traffic Engineering Department:

Priority number one includes two areas - the Randall Avenue/I-25 Interchange and the Pershing Boulevard corridor from Pioneer Avenue to Evans Avenue. This includes

improvements to geometrics and to traffic signalization. The area of Logan Avenue and Pershing Boulevard/Concord is also listed in priority one, but it is felt that it is not quite as high as the other two areas listed. The intersections of Logan, Concord and Pershing need also traffic signal improvements.

Priority two includes the corridors of Lincolnway from Missile Drive to Snyder with special emphasis at the Ames/Deming intersection and the intersection of Missile Drive/Happy Jack (9th Street). The latter intersection needs to be redesigned with improved geometrics and signalization because of its proximity to the Warren Air Force Base. Also listed very high is the area of College Drive and I-25 where the level of service drops to an unacceptable level.

Priority number three are the intersections on Logan Avenue from Pershing to Lincolnway with improved signalization and improved geometrics at the intersection of Lincolnway and Logan and improved signalization at 19th and 20th Streets.

Priority number four lists the intersections of Lincolnway and Morrie, Lincolnway and Converse and Lincolnway and Nationway that improvements to these intersections will also be needed.

Because of the changing patterns to traffic in the Cheyenne area, it will be necessary to have to new traffic signal timing plans not only for Pershing Boulevard, but to the central area of the city. Funds are requested to develop inbound, outbound and balanced traffic signal timing.

Another very high priority is for school safety funds. These are requested because of the impact creating new neighborhoods and causing additional hazards to existing neighborhoods for school children walking to school.

Five traffic aides will also be required because of the impact and funds are requested for add'l time, planning and setting up of signs, markings and other traffic control.

[illegible] the [illegible] shopping and recreational type trips need to be considered for [illegible] trips. Because of the [illegible] additional trips will probably be required to accommodate the shopping and recreational type trips.

SECTION C

Specific Comments from the Director of Streets & Alleys

1048 In Section 3.2.10.1.1 the sixth paragraph describes County road maintenance. The comment that "those roads only maintained by the County and roads under the full jurisdiction of the County" doesn't make any sense to me. Possibly, there is something wrong there.

1049 Figure number 3.2.10-6 indicating planned improvements is somewhat incorrect. Prairie Avenue will be 1984. Converse probably will be later than 1985 and I believe there are some changes in the area of Happy Jack that may have been agreed upon after the date the map was prepared.

1053 On Figure number 3.2.10-8 indicating traffic signals, I believe a signal is proposed at Prairie Avenue and Sunset Drive. On Figure 3.2.10-12, the legend has not been completed. In Section 3.2.10.1.2 paragraph 6, the consultant recommends additional study in certain locations. In his statement, he doesn't say what we should look for in the study, merely that circulation seems to be a problem. A little bit more specific comment probably would be appreciated.

1032 Also, the first location listed "Missile Drive to Deming Drive" doesn't make sense.

1056 Section number 3.2.10.1.3 explains project impacts. The first paragraph refers to morning peak hour assignments listed on a figure elsewhere in the report. Are these trips based on workers driving to Warren Air Force Base or are they based on all workers, some of which may be destined for other work sites. Also, do they include only workers and might there be trips made by family members of workers that might also create impact? Finally, are there other expected immigrants that will provide services to the project workers and their families that may also be making trips during the peak hour that should be included in the analysis?

1052

1055

1050 Section number 3.2.10.1.3 - will there be any impact on roadway surface conditions due to the project? I don't mean to insist that there will be, but it would be appropriate for the consultant to mention that there will not be if in fact that is the case.

989 The consultant should address routes for construction equipment and materials being delivered to construction sites in the Base and its jurisdiction (that elsewhere and the impact that those trips will make on the roadway surface.

1035 Figure 3.2.10-13 has the same title as Figure 3.2.10-11, but was different [illegible] known. One is the other should be corrected.

1033 Figure [illegible] showing estimated peak hour traffic volumes after mid-an increment [illegible] north of Happy Jack Road. The numbers per figure are known [illegible] north of Happy Jack Road only, but are known not there is no information at this time for the remainder of the network.

1037 The [illegible] report has indicated that in the South Cheyenne area, transportation [illegible] are high priorities [illegible] at this time. Yet most of the improvements [illegible] has been assigned in the first 5 years. Is there some way the [illegible] could [illegible] further development in an area that is known to have [illegible] problems? Perhaps [illegible] development [illegible] delayed [illegible] of the projects [illegible] the projects too expensive. Then many of the assumptions [illegible] the whole study [illegible].

Section D

AVIATION

Airport Manager's Comments

The "Aviation" section of the Socioeconomic Impact Study of the Peacekeeper Missile System based much of its information and background data on the Airport's 1978 Airport Master Plan.

1013 This Master Plan is considered totally inadequate and unrealistic in that it contains views and data of what community leaders at the time would like to have seen in airport growth, and not what was realistically going to happen.

The Airport Board is currently in the process of selecting a consultant to produce a new Airport Master Plan during calendar year 1984. It is felt that the findings of this study will correct inaccurate information and forecasts contained in the current Master Plan and thus be of greater use to the community and the U.S. Air Force in evaluating Airport impact.

As for the balance of the missile impact study, aviation section, there are three areas which need to be addressed further:

1014 1. It cannot be overemphasized that the existing condition of airport runway and taxiway pavements is, at best, marginal, and in some cases terrible. The increased aircraft activity anticipated by the Peacekeeper project will accelerate and worsen this deteriorating pavement condition. Whether this impact should be mitigated with U.S. Air Force funds or through a speedup of FAA grant monies to coincide with missile impact time frames, is a matter for negotiation. Something must be done soon to keep these pavements from posing a safety hazard to aircraft.

1015 2. The size, location and accessibility of automobile parking in the terminal area is very limited. The Airport is currently approaching capacity of existing space and would, as a normal course of events, be seeking additional space within two years. The missile project will accelerate the need for additional space and cause an even greater increase in demand.

1016 3. While the body of the report referred to a seating capacity and passenger space problem within the terminal building, it did not address any measures to correct the situation. The terminal building is critically short of space for passenger seating. While there are three aircraft parking slots, there is only one passenger access gate to the ramp. Enclosing the passenger concourse would not only provide additional seating capacity for arriving and departing passengers and guests, but would also provide passenger gate separation and better airline security screening activities. It would also allow the

correction of another problem, that being the inadequate size of the baggage area of the terminal. The non-standard design of the building contributes to these problems. But there is no way the building can handle the projected passenger enplanements envisioned in the report in the latter part of this decade with any reasonable efficiency or comfort to the passenger.

It is acknowledged that most of the aviation impact will be indirect; i.e., increases in corporate aircraft activity by missile project contractors and an increase in air carrier passenger loads, etc. There will obviously be some direct impact from an increased number of government aircraft operations which USAF Transient Alert will have to handle.

1067 Overall, it is felt that the general impact on the Airport will be somewhat larger than anticipated by the study. Most of this impact, however, should be private sector associated with the project and except for the specific problems outlined here, can probably be handled through the increased revenues which will be generated.

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The City of Cheyenne, Wyoming 82001

CHEYENNE AREA TRANSPORTATION PLANNING PROCESS

MAYOR DON ERICKSON

CITY COUNCIL
J. ROBERT STOREY, PRESIDENT
WILLIAM ANDERSON
CAROL E. CLARK
JOAN CLARK
JANE CRAWFORD
M. P. MARY GERTSCH
WANDA MCCUE
GEORGE SCOTT* REID
RONALD N. ROGERS

MEMORANDUM
November 14, 1983

TO : Major Peter Walsh, Director, Environmental Planning Division
Department of Air Force, AFRCE - BMS
Norton Air Force Base, CA 92409

FROM : Mike Gostovich, Chairman MG
Transportation Subcommittee
Mayor's IMPACT Team

SUBJECT : Comments on the DEIS

Comments General in Nature

1. The entire transportation model and resulting traffic projections are predicated on the assumption that most future residential development will occur in the South Cheyenne Area. Should current or future land use and/or annexation policies or considerations relative to the provision of public services direct future residential development to areas different than those indicated in the DEIS, the resulting traffic projections and recommended mitigation measures would have to necessarily be modified.

1002

2. The DEIS indicates that the South Cheyenne Area will be heavily impacted by the existing circulation model, as adopted as proposed in the document. However, very little consideration has been given to the transportation problems that would result. Both College Drive and Interstate 25 have been singled out as [illegible] impact [illegible] which require geometric changes relative to [illegible]. The Subcommittee feels that the DEIS does not address problems which will occur at other locations in Cheyenne which will be impacted. Particular emphasis [illegible] the Subcommittee to the safety of students going to and from Rossman School.

990

3. The DEIS identifies impacted areas and transportation mitigation measures, but the document does not provide any indication as to how the mitigation measures will be implemented. For example, the [illegible] with [illegible] Drive. [illegible] the [illegible] proposed [illegible] that [illegible] the [illegible] mitigation [illegible] the [illegible] mitigation [illegible] the [illegible] mitigation

CITY OF KIMBALL
Municipal Utilities
223 South Chestnut Street
KIMBALL, NEBRASKA 69145

September 23, 1983

State of Nebraska
Policy Research Office
Box 94601
Lincoln, Nebraska 68509-4601

Attn: Gayle Malmquist

Re: MX Related Review Document (WNSIS)

Dear Gayle:

This is to acknowledge receipt yesterday, 22 September, of the WNSIS. Following are few comments that I have regarding the document that are probably more on the order of "housekeeping" rather than anything else. I do think they should be brought to your attention though in order to have as accurate a document as is possible.

1. Table 7.1.1-1 "Airport Board" should read "City-County Airport Zoning Board".
2. Paragraph 7.1.2.1 Baseline Description. Second sentence should read "The Department has three sworn officers, the Sheriff and two deputies."
(I realize the foregoing two items are outside of my area of of jurisdiction but thought they should be brought to your attention.)

829 3. Table 7.2.1-2 Same comment as item 1. There should also be added "Kimball Airport Authority". The Authority is a separate legal entity consisting of five members elected by the electorate within the corporate limits of the City of Kimball and function under the provisions of the Statutes as determined by the State Legislature.

The following Commission and Boards should also be added to Table 7.2.1-2.
(a). Planning Commission.
(b). Board of Adjustment.
(c). Cemetery Board.
(d). Housing Authority.

961 4. Paragraph 7.2.4.1. Location of landfill should be corrected to "located approximately 1 (one) mile west of the city".

1085 5. Paragraph 7.2.10.1.1. The reference on page 7-36 to the State Highway 71 underpass catches the eye. This indicates a low clearance (14'3"). I don't know if this was actually measured during the course of the road inventory. The structure is signed for 13'6". No doubt NDOR will confirm this during the review. I could find no reference to the use of any part of

1086 the street system of the City of Kimball so I'm assuming none of the streets or State Highways within the corporate limits will be a part of the Peacekeeper stage transporter vehicle route, although the project requires that existing transporter/emplacer be able to accomodate the stage transporter vehicle. This is a question that NDOR will no doubt address.

976 A subject that is of the utmost concern today that is noticable to me by its absence is "energy". The thrust of the WNSIS seems to cover all of the salient impacts except energy requirements (electric power). Kimball has no specific problems in this area but I believe it should be a part of the ongoing monitoring process. Some communities are "locked in" with long term contractual arrangements but I noted no reference at all to power requirements. Perhaps this is not a problem but I'm convinced it should be considered.

271 I am the first to acknowledge that my following comments are far beyond my area of expertise (that is assuming I have any expertise at all) but my "gut feeling" is that the population projections are too low. I fully realize that projections are not an exact art and to get a rough feel of the future one must rely on generally accepted models and methodologies, but I also feel a little "windage" should be applied. There are now the rumblings of an increase in activity in oil industry. We are aware of

270 expansion plans in the near future and should these plans reach fruition, the projections are out the window. I will continue to closely monitor these activities. I suppose time will tell.

If any additional random thoughts come to mind I will touch base with you.

Very truly yours,

Robert E. Arrej
City Administrator

cc: Hon. Edith Haines, Mayor
City Council
File

244

CITY of LARAMIE Wyoming

P. O. Box C
PHONE 307 721-8200

October 27, 1983

Ronald A. Torgerson, Major, USAF
Deputy Director
Environmental Planning Division
Department of the Air Force
Regional Civil Engineer - Ballistic Missile Support (AFESC)
Norton Air Force Base, California 92409

Dear Major Torgerson

Please accept this letter as official comment by the City of Laramie on the "Socioeconomic Impact Statement for the Proposed Peacekeeper Missile System." Most of the comments included here pertain to Chapter 6 of the Socioeconomic Impact Statement entitled, "Social Profile and Socioeconomic Impacts for Albany County, Wyoming Jurisdictions". In addition, sections of Appendix D (Selected Facilities Condition and Capacity Survey) pertaining to Laramie and Albany County are briefly reviewed.

71 General Comments on Chapter 6

The overall impression given by this chapter is that the information was unsystematically gathered. Information is superficial and incomplete for some sections and very extensive for others. It appears that if the information was easily available, then it was included, however, not much effort was made to obtain less readily available information. This makes the report inconsistent in terms of the depth and coverage of the information included in various sections. If Albany County and its jurisdictions are going to be included in the report, the information provided should be complete and accurate enough to properly assess the socioeconomic impacts. Several sections where data are inaccurate or lacking are described below.

630 Page 6-5, Law Enforcement. This section indicates that the Albany County Sheriff's Department concentrates a good portion of its law enforcement activity in the Vedauwoo and Happy Jack areas of the Pole Mountain Unit of the Medicine Bow National Forest. In describing regional recreational impacts in a later section of the report (section 10.1.3.1) it is noted that Medicine Bow National Forest will experience the greatest overall absolute increase in recreational pressure of any recreation area within the seven county region. Additionally, it is stated that the Pole Mountain Unit will experience more than half of the total increase in recreational pressure in the Forest, and that most of the rest will be experienced in the Medicine Bow Unit. Since the Albany County Sheriff's Department has traditionally been responsible for law enforcement in these recreation areas, it is apparent that some additional law enforcement services will be required of the Sheriff's Department as a result of project related increases in their use.

Major Torgerson
Page 2
October 27, 1983

630 These demands for service should be taken into account in the evaluation of project impacts included in Section 6.1.2.3 of the report. In addition to law enforcement requirements induced by recreational visitors to Albany

1236 County, an assessment should be included on the impacts of increased recreational use on the Albany County transportation system and the potential for land use impacts related to development of recreational facilities, summer cabins etc.

783 Page 6-20, City Staffing. The Planning Department was left out of both the City and County staff descriptions. The Laramie/Albany County Planning Department has five full time employees and one part time employee. These figures should have been included in the City Annual Budget Reports cited as references for the information in Table 6.2.1-2. This increases total staff to 198.5 and will slightly change population to staff ratios included in Table 6.2.1-3.

803 Page 6-22, Capital Facilities. The statement that "the remodeling of the old Albany County Library will be the only major capital facilities improvement for the City of Laramie over the analysis period" is inaccurate. There are no definite plans to further remodel the old Library. In addition there are plans for other capital facilities improvements over the analysis period. Contact with local officials will verify that several capital facilities improvements have been identified and prioritized, and will be undertaken when funding is available.

Page 6-50, Section 6.5.1.2. Line 4 should be Albany County instead of Laramie County.

366 Page 6-78, Section 6.6.3.1.6. Mobile home park information is inaccurate, and the source for the information included is not cited. According to our most recent count, Laramie has 22 mobile home parks (not 25) with a total of 823 spaces. Albany County has 16 mobile home parks (not 2) with 401 spaces. Some of the inaccuracy may be due to the fact that many of the county mobile home parks are located within a mile or two of the city limits. However, the total number of spaces is 1256 rather than 1124 as reported. Vacancy rates in both the city and county are low based on reports from most mobile home park owners that they have waiting lists of people who wish to locate in their parks.

343 Page 6-80, Section 6.6.3.1.8, Apartments. According to the report, the information on apartments in Laramie is based on a survey of eight apartment complexes including 346 units. The exact definition of an "apartment complex" is not provided. However, assuming that a complex consists of a group of two or more apartment buildings under one manager, it is apparent that a survey of eight apartment complexes does not accurately reflect the overall status of apartments in Laramie. A major portion of the apartments in Laramie are not located in apartment complexes or in conventional apartment buildings. There are many units in houses, duplexes, townhouses,

343 etc. which were overlooked in the survey of apartment complexes. Consequently, the number of units is severely underestimated at 346 units, and available secondary data sources indicate that there are considerably more rental units than this in the City of Laramie. The *1980 Census of Population and Housing Neighborhood Statistics* for Laramie indicate that 4438 housing units were for rent in the City at that time.

346 Vacancy rates based on a limited sample of units and on a particular day of the year are also questionable, particularly in light of the fluctuations which occur with the U.W. student population over the course of the year.

Comments on Appendix D

603 The information on Albany County included in the Appendix indicates that although the information should have been readily available, not much effort was made to accurately obtain it. The worksheets are often incomplete, and the limited information provided is inaccurate in some cases. Examples of these problems are found in the sections on the old Library Building and on the Sheriff's Department. In addition, the old saying that "a picture is worth a thousand words" does not hold true in describing various local facilities. Finally, what is the logic of including only one out of seven elementary schools in Laramie in the survey?

Comments on Volume 1

351 Page 1-5, section 1.4.3 lists several potential mitigation measures to be considered for housing resources. One of the measures listed is: "Review and amend, if necessary, local development regulations which may tend to restrict or overregulate housing development." Who will be the judge of whether these conditions exist, and by what processes will regulations be reviewed and amended? Should local governments be asked to lower their standards to accomodate this particular project?

In closing, information from your office has been addressed to Mayor Nickelson whose term expired last January. The current Mayor of Laramie is Peggy Deaver.

Sincerely,

Flip McConnaughey
City Manager

cc: Peggy Deaver, Mayor
Thomas A. Curran, Planning Director

City of Scottsbluff
Nebraska
69361

October 5, 1983

Policy Research Office
State Capitol
Lincoln, Nebraska 68509

Attention: Gayle Malmquist

Re: Wyoming-Nebraska Socioeconomic Impact Study (WNSIS) - Peacekeeper in Minuteman Silos

Dear Mr. Malmquist:

Your transmittal of September 19, 1983 regarding the above-referenced study did not reach the City of Scottsbluff until September 28, 1983. Therefore, we were unable to comply with your request for a response by September 30, 1983.

The City of Scottsbluff does have some comments with regard to the Study and these comments are as follows:

814 1. With specific reference to page 8-23 of Volume 2 the section with regard to law enforcement incorrectly identifies the Police Department as having 30 sworn personnel. The correct number should be 28 sworn personnel. This coincides correctly with the balance of the numbers in that paragraph.

308 374 2. More generally, the summary of the study in Article 1 discusses the impact in the City of Scottsbluff as well as in Scotts Bluff County and the City of Gering in very cursory terms and either states or implies that no impact will occur in Scotts Bluff County, the City of Scottsbluff and the City of Gering. At the same time the study does note that there will be a need for additional mobile homes in Gering and Scottsbluff. The more detailed sections of the report indicate that, in the opinion of the authors, there will be some impact in Scottsbluff, Gering and Scotts Bluff County but that this impact will not be sufficient to require mitigative actions. Although we would generally agree that most

374 impacts will not be sufficient to require mitigation, there are impacts, as identified in the detail, and to state in the summary that there are no impacts is misleading to the individual who does not read all of the detail in each section. Therefore, we would recommend that the language in Article 1 be corrected to show the actual impacts or the fact that there are impacts which perhaps are not significant.

309 821 1091 3. At the same time, however, we feel it important to point out that there will be some impacts which are probably indirect rather than direct. These appear not to have been considered in the study. Specifically, the City of Scottsbluff has historically served as a retail center for the entire Panhandle, as well as for parts of Goshen, Laramie and Platte Counties in Wyoming. It has also served as a medical center for this same area. With increased population in any part of the Panhandle and, specifically, in these counties it can be anticipated that there will be additional traffic and activity in the Scottsbluff community. This activity and traffic will not result in any direct revenues to the government of either the City or the County since the communities do not share directly in the sales tax. It is not likely, therefore, that the governmental agencies will see any increase in revenues as the result of this activity in traffic but will have to provide service to handle the activity and traffic. Again, we recognize that the impact will probably not be of an extreme nature but will require either additional hours of work in the affected services or, alternatively, sacrificing other services to operate within the hours of work available.

1009 4. In addition, the traffic generated from the western portion of the Panhandle and eastern portion of Wyoming will definitely affect the condition of the road generally identified in this area as the Stegall cut-off. This is a road through Banner County which has approximately 12 miles of unpaved surface. The balance of the route, located in Scotts Bluff County and in Wyoming, is currently paved. It would appear that the paving of this 12 mile stretch in order to accomodate both direct impact of the construction as well as the indirect impact of the traffic flow from the additional population should be included in the schedule of mitigating actions.

254 5. We would also point out that the Chicago-Northwestern Railroad Project represents a significant employment activity which will be coinciding at the same time as the Peacekeeper Project. The combined impacts of the two projects may very well have

254 considerably greater impact on the Banner and Scotts Bluff County area than is anticipated in the report.

Obviously, the time for comment has been very brief and, therefore, our comments have also had to be brief.

Thank you for the opportunity to comment on the report.

Sincerely yours,

Frank U. Koehler
City Manager

FK/vb

cc: THE HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL
Fredric H. Alley, Director of Planning, Building and Development
Mary Lou Strauch, Executive Director, Panhandle Resource Council

246

City of Scottsbluff
Nebraska
69361

November 16, 1983

Policy Research Office
Room 1321 State Capitol
Box 94601
Lincoln, Nebraska 68509-4601

Attention: Gayle Malmquist

Re: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

Dear Mr. Malmquist:

Reference is made to the Draft Environmental Impact Statement for Peacekeeper in Minuteman silos dated October, 1983 as well as the Draft Environmental Planning Technical Reports which supplement the Environmental Impact Statement.

The City Council, at an adjourned meeting on Wednesday, November 16, 1983, reviewed the above documents and has instructed me to advise you of the following concerns:

1009 1. As noted in the documents, the City of Scottsbluff serves as a retail and medical center for the Nebraska Panhandle and a portion of Eastern Wyoming. One of the roads used to achieve access to and from Scottsbluff is the combination of roads generally referred to as the Stegall cut-off. This road system in northwest Banner County has approximately 12 miles of unpaved surface. The balance of the route, located in Scotts Bluff County and in Wyoming is currently paved. With the increased population in the area including both those who will reside in the Scottsbluff-Gering area as well as those who will be coming to the Scottsbluff-Gering area for retail, medical and other services there will be increased traffic on the Stegall cut-off. This increased traffic undoubtedly will result in greater wear and tear on the Stegall cut-off and will, therefore, either result in increased maintenance costs for Banner County or, alternatively, the need to pave the 12 mile stretch referred to earlier. The City of Scottsbluff urges that the impact on the Stegall road connection be re-evaluated and provision made for surfacing of that roadway or, at least, supplemental funds for adequate maintenance.

Policy Research Office
Attention Gayle Malmquist
November 16, 1983
Page 2

11 74 2. The Cities of Scottsbluff and Gering lie closer to a proposed MX facility than any other comparably sized community. Therefore, the City Council requests that a scoping hearing be provided in the Scottsbluff-Gering area in order to adequately respond to the questions and concerns of persons residing in our community. The City of Scottsbluff believes that the process followed to this point does not adequately address the potential impacts of the system on the Scottsbluff-Gering community.

40 3. A review of the Environmental Impact Statement and the related documents does not indicate any evaluation of the impact, if any, that the installation of the MX Missile might have, psychologically, on people in the surrounding area and, in particularly, on the young people in the communities. It is the opinion of the City Council that this issue should be addressed to determine whether or not the installation of the proposed system would negatively affect motivation and mental health among our citizens.

Thank you for the opportunity to comment.

Sincerely yours,

Frank U. Koehler
City Manager

FK:vb

cc: John McLellan, Mayor, City of Gering
Chairman, Banner County Commissioners
Fredric H. Alley, Director of Planning, Building and Development
Mary Lou Strauch, Executive Director, Panhandle Resource Council

POLICY
RESEARCH
OFFICE

MEMO...

[illegible] STATE CAPITOL · LINCOLN NEBRASKA · 68509
PHONE 402 471-2414

TO [illegible]

[illegible]

FROM [illegible] DATE [illegible]

Nebraskans Opposed to the MX
P.O. Box 125
Scottsbluff, Nebraska 69361
1-308-635-7768

EXECUTIVE COMMITTEE
Susan Buckles, Esq.
Marsha Fangmeyer, Esq.
Kathleen Glatz
Marian Lenzen
Rev. Howard Osborne

COORDINATOR
Jeff Tracy

November 16, 1983

Mr. Frank Koehler
City Manager Scottsbluff
City Hall
Scottsbluff, Nebraska 69361

Dear Mr. Koehler:

This morning I attended the Scottsbluff City Council meeting and had prepared a short statement on the MX DEIS and its short comings regarding Scottsbluff. I did not speak at the meeting because I felt your overview and Marjorie Mandujano's recommendations covered what I had planned to say. However, I later felt that there was one point that deserved more attention and therefore this letter.

The DEIS as you know contends that Scottsbluff, because it will not have a 5% increase in population in any one year during the construction period does not merit a detailed study. None-the-less, Scottsbluff and Gering will both suffer impacts due to the project, particularly in the social services areas.

The problems that the DEIS project for Kimball will of course oftentimes be applicable to Scottsbluff as well. As you know, they project:

- ** surplus job seekers
- ** a rise in alcohol consumption leading to "increased accidents and arrests"
- ** a rise in crime rate
- ** additional burdens on social services
- ** an increase in domestic violence

In addition, on page 3 87 in the DEIS it states in reference to Kimball, " The absence of most human services in Kimball is an indication that people must travel for most services or do without certain ones." This traveling elsewhere for services I would assume means going to Scottsbluff or Gering where those services are offered. This is another impact for Scottsbluff that is not included in the DEIS.

The Air Force has designed several good mitigation measures for Kimball. Who pays for these services is of course not

NO MX

made clear.

Governors Kerrey and Herschler and Secretary of Defense Weinberger have all signed a contract to clarify the mitigation process. In that contract on page three section seven it states " Department of Defense(DOD)agrees that in conducting its peacekeeper related activities, it will plan for and support funding for whatever mitigation assistanse may be required to the state and local governments, including school districts." We can from this contract, assume that the Federal Government in one form or another will help out as much as possible with the cost of the mitigation measures. However, because Scottsbluff is not included in any of the detailed studies in the DEIS the chances of them getting any Federal assistance for any impact they suffer no matter how large or small, is remote.

Charles Ellington, the western director of the U.S. Office of Economic Adjustment, has told the Peacekeeper Working Group, the appointed boiy of the Governors, that " documentation would be needed before Congress would even consider releasing ' front ' money." Because Scottsbluff was not in the region of concentrated study and therfore has had no detailed study done on the potential impacts on it, the documentation needed for funds will be unavailable.

I am not sure how this can be rectified but Scottbluff is certainly deserving of having it rectified. My recommendation would be that the City Council request that the Public Finance, Social Well-Being, and Public Services sections of this DEIS be redone so that it includes Scottsbluff. Without this, I am afraid Scottsbluff will miss out on any potential impact aid and I think we can safely assume that Scottbluff will be impacted in these three areas by the MX project.

Thank you for your time.

Sincerely yours,

Jeff Tracy
Coordinator for NO MX

cc Marjorie Mandujano

Frontier Conservation District

P O Box 871 Cheyenne, Wyoming 82001 247

November 4, 1983

Gordon Fornell, Brig. Gen., USAF
Special Assistant for Peacekeeper
DCS/Research, Development & Acquisition
HQ USAF/RD-M
Washington, DC 20330

Dear General Fornell:

1459 The Frontier Conservation District wishes to express our extreme dismay that the WMEIS report failed to address the already obvious, documented situation with respect to impact on the resources of the Conservation Districts by the proposed MX development.

Reference to past correspondence (enclosed) should reveal that the need for soil surveys has been a recognized fact for the past several months. The only unresolved question has been the source of manpower to perform the surveys.

Please forgive the repetitiveness, but once again we remind you that the project areas themselves require soils information, the ancillary development of support areas needs soils information, and the housing and industrial expansion requires soils information for proper resource management.

Let us also remind once more that the surveying should be performed at the level of Soil Conservation Service standards so that the effort is in concert with existing information and relevant to any proposed use of the land resources.

It is estimated that 3 survey crews will be needed to perform the job in a timely manner.

Please keep in mind that the local Districts are not staffed for this demand, and this fact should be reported in the WMEIS report.

We pledge our cooperation and expect yours in making the best possible use of our land resources.

Sincerely,

Ed Francis, Secretary
Frontier Conservation District

xc: Wm. A. Verkest, Lt.Col., USAF, Regional Civil Engineer - MX(AFESC), Norton Air Force Base, CA. 92409
Bill Gentle, Wyoming Conservation Commission, Cheyenne, WY. 82002
Capt. Mike McMullin, Peacekeeper, Cheyenne, WY. 82001
Frank Dickson, SCS State Conservationist, Casper, WY. 82602
Dick Hartman, State Planning Coordinator, Wyo. Comm. Comm., Cheyenne, WY.

248

South Cheyenne Water & Sewer District

908 Drew Court
307/635-5808 CHEYENNE WYOMING 82007

October 11, 1983

Department of the Air Force
AFESC
Norton Air Force Base
California 92409

Dear Sir:

The South Cheyenne Water and Sewer District office received the copy of the Wyoming and Nebraska Socioeconomic Impact Study.

The South Cheyenne Water and Sewer District is a governmental subdivision of the State of Wyoming and a body corporate with all the powers of a public quasi-municipal corporation. It is an unincorporated area adjacent to the corporate limits of the City of Cheyenne, Wyoming.

956 Noting that although the study implied approximately 60% of any of influx of population to this area due to the projected MX construction, very little was actually targeted at this area.

889 The District is aware of the shortage of residential units available in the Cheyenne/Laramie County vicinity for growth of any magnitude. We do feel that the study was inadequate as to the water and sewer services available within the boundaries of our District

Yours truly

Flaydine J. Gay, Secretary-Treasurer
SOUTH CHEYENNE WATER & SEWER DISTRICT

249

Town of LaGrange

P O BOX 188 - LAGRANGE, WYO. 82221

October 11, 1983

Mr. Ronald A. Torgerson, Major, USAF
Deputy Director
Environmental Planning Division
Norton Air Force Base, Calif. 92409

Dear Sir;

1060 The Town Council and myself examined the reports which were sent to us concerning the Socioeconomic Impact to this area. We were not surprised to find that no impact to LaGrange was anticipated but feel this is not entirely correct due to our experience with previous missle programs. Even a small amount of impact can be a detriment to a small town such as ours. We are particularly anxious that the road and highway situation was not very clearly 82 studied. It is also our impression that a lot of money was spent on the study which wasn't necessary if the area of "deployment" had already been decided. Maybe we aren't being given a full account of water, road, and "site" usage?

We will send a representative to the October 24, meeting if possible.

Sincerely,

Town Clerk, Town of LaGrange, Wyoming

MEMORANDUM OF INDIVIDUAL TELEPHONE OR VERBAL CONVERSATION 250

RECEIVED BY / LOGGED BY	OFFICE SYMBOL	EXTENSION	DATE	TIME
MAJ TORGERSON	DEV	4891	20 OCT 83	0845

INDIVIDUAL(S) CONTACTED (NAME, GRADE, TELEPHONE NUMBER, ORGANIZATION)

MR. DUNHAM, CITY CLERK, WHEATLAND, WY.

SUBJECT OF CONVERSATION

WHEATLAND COMMENTS

SUMMARY OF CONVERSATION

1211 WYS/S 1, p. 4-30, SECTION 4.2.9.1.5

- THE BLACK MOUNTAIN RECREATION CENTER IS LOCATED WEST NOT SOUTH OF LEWIS PARK
- IT IS 12,000 SF
- THERE IS NO OUTDOOR POOL
- THERE IS NO 9-HOLE GOLF COURSE
- THERE ARE TWO OUTDOOR TENNIS COURTS PLUS A SMALL INDOOR POOL (CLIFF & GOFF x 10 ft @ DEEP END)

796 WYS/DEIS 1, p. 4-3, SECTION 4.1.1.1.3

- 3RD LINE, ~~SHEET~~ OF NEXT PARAGRAPH; CHANGE "TORRINGTON" TO WHEATLAND.

COORDINATION

OFF SYM	DATE	INIT

TO FILE:

ACTION REQUIRED

- CORRECT WYS/S

ACTION OFFICER(S) (NAME, GRADE, TELEPHONE NUMBER, ORGANIZATION) — SUSPENSE

MAJ TORGERSON, 382-4891, AFRCE-AMS/DEV — 20 OCT 83

AFRCE-AM FORM 3 NOV 80

251

1 We have reviewed the Draft Environmental Impact Statement.

[X] No comment.

[ ] Comments are attached.

RECEIVED
OCT 27 1983
POLICY RESEARCH

Name Delores Eagelston Title Village Clerk

Office Village of Morrill

Address Box 305 Morrill, NE 69358 Date 10-24-83

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-2414
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

ORGANIZATIONS AND INDIVIDUALS

252

American Indians Against Desecration
5333 Southeastern Ave.
Indianapolis, Indiana 46203
(317) 355-3413

Field Office
P.O. Box 2
Gordon, Nebraska, 69343

November 19, 1983

Major Peter Walsh
SAMCO - BMS/DEV
Norton AFB, CA 92409

We are extremely pleased to have received on 11-11-83 copies of the Draft Environmental Report for the Peacekeeper Minuteman Silos. In discussion of the report with our agent, Ms. Karen Whittlesey CRS-Denver, it was inquired as to whether AIAD would wish to have input and act as consultants for purposes of cultural management resources. While we are awaiting an official request before placing the question of consultant status before our board, we can assure you we wish input into any decision, question or plans reference any ground disturbance of the area in question and its effect on archaeological sites.

1267 A brief review of the environmental report, cultural resource section, clearly indicates a severe lack of influence by highly significant archeological sites and we are surprised that any statement would be attempted without input from Indian people in general (as required by various laws) and AIAD specifically. Perhaps this is due to placement of cultural resource team from outside the immediate area. Had you consulted with the Native Americans or had better working rapport with the Advisory Council on Historic Preservation, we are confident many of the problems we now confront could have been resolved. As input from AIAD could have been solicited. The end result, as clearly is, is a lack of insight or consideration given archeological sites. Certain sites could prove to be a definite problem. This must be corrected, as we are duty bound to do. If there are any questions, please feel free to call.

Specific problems and objections as noted thus far of the Draft Environmental Impact Statement & Report - Cultural Resources section enclosed:

28 1. Since we have no rights, interests with, we have only a certain knowledge of the archaeological sensitivity of the area in question. AIAD does not employ an archaeologist and, because of the technical language involved, must seek outside help from a professional qualified in the subject matter. With appropriate time, we will be able to make a detailed analysis of the technical report involving cultural resources.

We suggest this situation be avoided in the future by including AIAD on your mailing list for information relevant to Indian interests. Meanwhile, we object to any final statement until we are given appropriate time for comments.

1276 2. There is an obvious deficiency of archaeological input and surveys resulting in a lack of knowledge and planning to avoid significant archaeological sites. In order to avoid important sites, it is only logical that they must

-2-

first be identified. It appears this has not been done and we strongly recommend correction by employment of a well qualified archaeologist familiar with prehistoric Native American works. Until such time as significant sites are identified, we object to any planning and/or ground disturbance within the region of influence.

3. The land in question is part of the 1868 Ft. Laramie Treaty. As was accurately pointed out in the draft report, Cultural and Paleontological Resources, pgs. 3-425, para. 3:

> "Concerning the region to the South the government abandoned its forts and forbade white travel through the area. This treaty must rank as one of the greatest Indian triumphs . . . a victory that was short-lived. The Black Hills gold rush in 1874 . . . led to the treaty of September 25, 1876. The treaty was signed by a small minority of Indians at the Sioux agencies, even though the 1868 treaty did not allow for the land cessions unless three-fourths of the adult males signed."

1277

Given the above statement, the obvious conclusion is that the 1876 treaty is invalid and the 1868 treaty is in effect. For this reason, until consultation and/or compensation is made in accordance with the requirements of the 1868 treaty, no action should be considered within the region of influence.

4. Page 3-413, para. 2, Cultural Resources section, discusses measures taken to protect archaeological resources. It specifically states:

> ". . . negotiations are currently underway to develop a Programmatic Agreement between the Air Force, the SHPO, and the Advisory Council pursuant to 36 CFR 800 for comprehensive management of all cultural resources at Francis E. Warren AFB."

1278

We strongly object to such protection measures being limited to only those areas Warren AFB wishes could focus primarily on historic sites. Perhaps you could explain what prehistoric sites, which obviously involves Indian interest, is not given the same interest and/or purpose of preservation? Recent Executive Order 11593, which specifically mandates that all cultural resources are preserved, states that if destruction occurs, a memorandum must be arranged which will provide all information possible before the region of influence is open and we request to be kept apprised and participate.

5. Cultural Resources Section, page 3-417, Para 3.5, Sec 3.6, Social Economic Future - No Action Alternative, states:

> "Based on interviews with both Cheyenne and Arapaho Indian representatives, it was determined that there were known sensitive areas or resources of cultural or religious concern to these groups within the SAFL. Given this information, many Indian tribes have accepted the reality since the nineteenth century, the likelihood of encountering sites of limited traditional, spiritual or secular value to such groups is slight. Future impacts to such resources should be negligible."

1267

The above statement is false, inaccurate and totally incompatible with the overall report. Further, we specifically request identification of the individual responsible for such an inaccurate statement.

-3-

Specific objections include:

A. As your environmental report of cultural resources indicates, a number of Indian nations inhabited the region in question. Yet the authors selected to consult with only two. We seriously question the motivation of such actions as well as the professionalism in such a decision. For example, as previously stated, the area was/is part of the 1868 Ft. Laramie Treaty, yet the authors fail to mention any consultation with the Lakota Nation, the legal owners of the land.

1267

B. The 'Indian Representatives' mentioned in the report fails to identify whether traditional or tribal council, spiritual men, number of individuals consulted or method in which consultation took place. Until further information is available, we have no way to determine whether legal compliance was met as per the American Indian Freedom of Religion Act, the 1966 Historic Preservation Act and the National Environmental Protection Act.

1281

C. Throughout the report on cultural resources, numerous burial sites were identified as being removed from various locations within the region of influence. Indian burial sites are protected. Contrary to the conclusions stated above, this is only one of scored areas of immediate, traditional, sacred and secular value.

D. With minimal amount of investigation, it is determined that the region of influence is the location of many significant historical sites currently utilized by various tribes. Additional information through consultation must be accurate for a better understanding of the effects of planned construction.

1279

E. The overall statement implies that:

(1) Since the area has been occupied by Indians for a relatively few years, it therefore is not sacred;

or (2) The entire area is not known of extant resources;

or (3) It is unimportant because it is unidentified.

All of the above are incorrect. As an example, the Black Hills are sacred area for various Indian nations. It was never recognized until dates to the time of Crazy Horse, in this case unrecognized that areas may exist which are part of influence for the Native American cultural uses and is considered valid even if not currently occupied.

F. Cultural Resources Section, Page 3-413, Sec. 3.6.1.1 para. 2 states:

> "A recently completed survey of the University of Colorado portions of the site recorded eight prehistoric sites, isolated artifacts and areas; therefore, it is quite possible that virtually any ground-disturbing activity on base has the potential for encountering additional prehistoric remains."

1280

By prehistoric remains, if the report is referring to the remains of Indian people we wish to immediately and formally request notification which are removed and/or remains are recently buried. Further, we wish a copy

...

of the archaeological report/survey completed. Finally, you should be aware that we strongly object to such desecration of our graves and strongly object to any research that may or may not be taking place on said remains. We are extremely concerned and object accordingly that such test excavations were completed without a memorandum of agreement having been concluded with the Advisory Council on Historic Preservation and without consultation with traditional Indian people.

1280

F. We request to be informed as to why authorized by 43CFR3e0 et for reasons including lack of human remains within the region of influence; past employment record and past problems involving desecration of sacred Indian burial sites.

1270

Overall, Major Walsh, the Cultural Resource section of the environmental statement needs considerable improvement. It is important that we are informed of any planned activity which may or may not affect significant archaeological sites. Further, there are a number of remains of Indian people which have been removed from the region in question. You should be aware that these remains are sacred and to that extent the first step in establishing a cooperative working relationship is to locate their present depository and take appropriate arrangements for reburial.

In summation, we wish to emphasize it is not Native American religion, religious practices, or its traditional beliefs, which are the subject of this present and future concern. It is our purpose to protect sacred Indian burial sites, archaeological sites. It appears to us that we have a vested interest which we are all willing cooperation can determine the needs to which this interest flows. To expedite this matter and avoid future legal problems, we recommend immediate action in the following areas.

1268 1. Identification of tribal spokesmen from within your agency whom we can site by name with.

1269 2. Identification, location and removal of the Indian artifacts previously removed from the within the region of influence.

3. Specific mention of agreement with the SHPO which would include protection of all disturbed archaeological sites from the agency the region of influence.

We appreciate your time and look forward to a strong working relationship.

Respectfully,

Joe Haswell
Director, A.I.D.

cc:
Russell Means
Bill Means

253

BROKEN PLOW LAW OFFICE
Star Route 1, Box 33B
Chadron, Nebraska 69337
308/432-4259

November 28, 1983

Major Peter Walsh
Environmental Planning Division
Building 520
Norton Air Force Base
San Bernadino, California 92409

Re: Comments upon the DEIS of the deployment of the MX missile

Dear Major Walsh

As you know, the minimum 45 day comment period upon the Draft Environmental Impact Statement (DEIS) upon the deployment of the MX missile in existing minuteman missile silos in Nebraska and Wyoming has caused considerable difficulty regarding the ability of concerned organizations and persons to have their comments submitted within the deadline. It had been the wish of a number of public interest organizations to jointly submit an exhaustive, well-organized document embodying all of their comments. However, the unreasonable deadline set by the Air Force has not made that possible and those organizations are now forced to send in separate comments and their experts are forced to send in comments directly to the Air Force. These comments are therefore coming to you from a large number of different sources around the country, but, it is still the wish of those organizations to jointly adopt and affirm the comments of each other and to affirm and adopt the comments of certain individuals and other organizations so that their comments are considered as complete and unified as possible.

31

In this light, I have been authorized and instructed to inform you that the following organizations submit their comments to the DEIS jointly, in full

WESTERN SOLIDARITY of Denver, Colorado
TRI-STATE MX COALITION of Cheyenne, Wyoming
NEBRASKANS FOR PEACE of Lincoln, Nebraska
NEBRASKANS OPPOSED TO THE MX - NO MX of Scottsbluff, Nebraska
NEBRASKANS FOR PEACE, Scottsbluff Chapter, of Scottsbluff, Nebraska
CHEYENNE COUNTY NO MX, Sidney, Nebraska
NEBRASKA NUCLEAR WEAPONS FREEZE CAMPAIGN, Lincoln, Nebraska
WYOMING NUCLEAR WEAPONS FREEZE CAMPAIGN, Laramie, Wyoming
DENVER NUCLEAR WEAPONS FREEZE CAMPAIGN, Denver, Colorado
MX INFORMATION CENTER, Salt Lake City, Utah
WOMEN IN FARM ECONOMICS (WIFE), Nebraska Chapter

As their comments upon the DEIS, each and every one of the above-named organizations adopts, affirms and alleges as though set forth in full herein the following:

Each and every comment submitted in writing by any of the above-named organizations or by any persons identified as or known to be members of the above-named organizations regarding the DEIS or the EIS process, including scoping, in this matter.

Each and every comment submitted orally by any of the above-named organizations or by any persons identified as or known to be members of the above-named organizations regarding the DEIS the EIS process, including scoping, in this matter

The comments upon the DEIS submitted in writing or orally by:

COLORADO DEPARTMENT OF WATER AND NATURAL RESOURCES, Denver, CO
COLORADO GOVERNOR RICHARD LAMM, Denver, CO
HOUSE REPRESENTATIVE PAT SCHRODER of Colorado
WYOMING WILDLIFE FEDERATION
WYOMING OUTDOOR COUNCIL
WYOMING NATURAL HERITAGE PROGRAM
WYOMING NATURE CONSERVATORY
WYOMING SIERRA CLUB
DOMESTIC VIOLENCE TASK FORCE DOVES, of Scottsbluff, NE
CENTER FOR RURAL AFFAIRS of Walthill, NE
Dr Ronald Weedon of Chadron, Nebraska
Dr Ira Helfand of Springfield, MA for the Physicians for Social Responsibility
Dr Richard Gardiner of Chicago, Illinois of Physicians for Social Responsibility
Rev Sally Palmer of the Wyoming Nuclear Weapons Freeze Campaign
Rev Howard Osborn of Bayard, Nebraska
Dr Tom Bogstey of Cheyenne, Wyoming and member of the Mayor's Committee
Prof Daniel Schlitt of Lincoln, Nebraska
Prof Donald Tulley of Lincoln, Nebraska
Prof Ty Harrison of Lincoln, Nebraska
Ms Betty Olson of Lincoln, Nebraska
Mr Santana Tamaras of Scottsbluff, Nebraska
Ms Jan Hamil of Indianapolis, Indiana regarding archeological sites
Ms Marion Lenzen of Sidney, Nebraska
Mr Dennis Baack of Dix, Nebraska
Ms Susan Baack of Dix, Nebraska
Ms Joan Snyder of Kimball, Nebraska
Mr B... Olson of Harrisburg, Nebraska
Ms Donna Olson of Harrisburg, Nebraska
Ms Sylvia Soule of Harrisburg, Nebraska
Ms Monica Kirk, Esq., of Scottsbluff, Nebraska
Ms Susan Buckles, Esq., of Scottsbluff, Nebraska
Ms Evelyn Litsy of Denver, Colorado
Mr Kevin Ruser [illegible] of Scottsbluff, Nebraska
Ms Maria Painter of Nevada
Mr David McGuire, Wyoming archaeologist
Ms Kathy Jordan, Wyoming archaeologist
Mr Dennis Morrow, Wyoming hydrologist
Mr Larry Ostresh, Wyoming geologist
Mr Steve [illegible] of Salt Lake City, UT
Mr Stan Holmes of Salt Lake City, UT
Mr Jeff Iracy of Scottsbluff, Nebraska
Mr Francis Lusk, of Cheyenne, Wyoming
Mr Tim Strand of Cheyenne, Wyoming
Mr Andrew B. Reid, Esq., of Chadron, Nebraska
Ms Sarah Gorin-Jones of Laramie, Wyoming
Mr Jim Woodward of Ft. Collins, Colorado
Mr Bob Lawrence of Ft. Collins, Colorado
PHYSICIANS FOR SOCIAL RESPONSIBILITY
EDUCATORS FOR SOCIAL RESPONSIBILITY
UNION OF CONCERNED SCIENTISTS
SANE
COMMON CAUSE
NATIONAL CAMPAIGN TO STOP THE MX
CENTER FOR DEFENSE INFORMATION
FRIENDS OF THE EARTH
LAWYERS ALLIANCE FOR NUCLEAR ARMS CONTROL
GREENPEACE
COLORADO NUCLEAR WEAPONS FREEZE CAMPAIGN

If you cannot locate the oral and/or written comments of the above-named organizations or persons, please let me know and I will try to furnish more information which will help you locate them. Some of the comments may arrive after your deadline due to the unreasonable length of the comment period. There are many other organizations and persons who wish to comment and there are other comments the above-named organizations would like to make, but such organizations and persons are constrained by the deadline. This is a violation of NEPA and the due process clause of the Fifth Amendment. The comments are by no means complete or exhaustive.

Enclosed you will also find the following documents:

MX Missile Contractors list published by NARMIC, December, 1980
Update to the above, dated March, 1981

These documents and the documents sent to you by Maria Painter under separate cover regarding the safety and need for the MX missile are further adopted, affirmed, and alleged by the above-mentioned organizations as though they were set forth in full herein as part of their comments upon the DEIS.

Strength through Peace,

Andrew B. Reid, Attorney

Print Comment Forms

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This document contained the following attachment:

National Action/Research on the Military Industrial Complex, "MX Missile Contractors," Philadelphia, PA, 1980.

TESTIMONY FROM

WHEATLAND, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-396

To U.S.A.F. 255

Response to
D.E.I.S.

Geologists & Hydrologists
Casper
Wyoming
Nov. 3, 1983

SUBMITTED TO U.S.A.F. at Wheatland Hearing, November 1, 1983

QUESTIONS AND CONCERNS IN RESPONSE TO:
DRAFT ENVIRONMENTAL IMPACT STATEMENT OF OCTOBER, 1983

I. Concerns regarding TIME and DISTRIBUTION of this report:

17 A. The October '83 D.E.I.S. arrived at Natrona County Library on a Friday evening and was available to the public by Saturday morning 10/29/83. This did not allow enough time for knowledgeable and environmentally concerned scientists to review and research the report in preparation for impact hearings on Nov. 2 & 3.

22 B. Why are there no hearings scheduled in Casper (Wyoming's largest city which is also designated to receive evacuation impact)? There are many concerned people in Casper who have not yet spoken to this issue.

123 C. Reports of this magnitude demand study by all concerned with aspects that surround the issue, and for a much longer time frame than you have allowed.

II. Concerns regarding possible leakage from silos into the ground water.

A. What is your guarantee that there will be no radioactive leakage or other pollutant problems with the MX silos?

133 1) Ranchers and municipalities draw their water from aquifers that could be contaminated by a leakage. (Exhibit 1, Pg. 2.102 - 2.2.1.2.4 and 3.2.1.2.-.1.)

2) Reservoirs and intermittent stream flows are supplied by the ground water and could also be contaminated.

1325 3) How will your proposed gravel mining in shallow alluviums affect the ground water quality?

134 B. What is you plan to deal with the expanding soils which crack concrete structures in Wyoming?

C. What is your guarantee that there will be no tectonic movement in the silo areas? (Exhibit 2, Pg. 2-119 - Fig. 2.2.1.3-2)

1469 1) How complete and thorough is your knowledge of faults and quakes in the entire REGIONS OF INFLUENCE FOR GEOLOGICAL RESOURCES (Exhibit 2 Pg. 2-119 - Fig. 2.2.1.3-1)

2) There are no Geological Survey of Wyoming County Resources Series developed as yet for Laramie, Albany, Platte, and Goshen counties. This series maps the the known seismic activity and fault locations to date)

1467 3) Richter instrumental readings have only been available since early 1900's. These are the only reliable recordings of quakes. The Modified Mercalli reports which you use throughout this report are subjective & small reports and therefore invalid. (see Exhibit 4, Pg. 2-113

4) [illegible] no precise way when a fault will be active or not? In geological time, [illegible] 100 years readings is hardly an indicator. The present [illegible] are beginning their formation in the Cenozoic period [illegible] still rising and falling today. A MAJOR QUAKE COULD DEVELOPE [illegible]

1466 5) (Exhibit 2, Pg. 2-117, 2.2.1.2.1.1 - Regional Seismicity - Exhibit 4) [illegible] Earthquake Information Service data show [illegible] 1962) suggest that the filling of Lake Pueblo Reservoir [illegible] has shown may have induced the seismic activity." How and for what [illegible] regions of the REGION OF INFLUENCE FOR GEOLOGICAL RESOURCES can you guarantee there will be no artificially induced tectonic activity? How will you control unrelated projects that could activate tectonic movement?

1471 6) What is your plan for the Silos located in the Flight Location and affected by the Wheatland-Chalen Fault Zone? (Exhibit 5, Pg. 2-120 - 2.2.3.2.1.2 - Faulting, and Exhibit 6, Pg. 2-121, Fig. 2.2.3-3)

III. Concerns regarding the effect of this project on water supply.

A. Do the statistics in your report reflect drought conditions?

1296 B. How do you plan to obtain and use the water rights from the Crow Creek watershed area?

1) Will you file on new available water rights, or buy up old rights? (Exhibit 7, Pg. 2-92)

198 2) What will happen to people who have sold off part of their rights if we have a drought?

1335 3) In using these water rights, how will you guarantee that you will not deplete the aquifer to the extent that it can never be rejuvinated?

1332 4) Even if you do not deplete the aquifer completely, it takes many years for ground water to travel and accumulate back to it's original capacity. If an owner relinquishes his water rights to this project for a short time, it could conceivably take ten or more years for his supply to be back at its current capacity. (Exhibit 3, Pg. 3-224)

1337 5) If more water is used from this system it will decrease the spillage and bypass levels which now make water available to recharge the ground water supplying the municipal wells. (Exhibit 9, Pg. 2-97)

1297 C. What is the Impact on Stage II Cheyenne Water projects how will your use of water affect Cheyenne and Casper? (Casper is suppose to be able to purchase water from Cheyenne.)

1305 D. What do you plan to do when the impact in 1985 goes above the supply? (Exhibit 10, Pg. 3-225, Fig. 3.2.1-1 and Exhibits 11 & 12, Pgs. 3-222 - 3-223, Tables 3.2.1-2 and 3.2.1-3)

1298 E. Your plan to reuse waste water in 1985 will be depleting the source of downstream recharge water.

1324 F. This report should contain maps showing the cone of depression created by your well fields, reflecting how the water table will be affected in the surrounding area. It should take into account the worst possible conditions. You should explain more technically your use of the term 'moderate' impact. A year without water could break a rancher. (Exhibits 13 & 14, Pgs. 3-228 & 3-229)

THIS PRELIMINARY COMPILING OF CONCERNS WAS DONE BY CASPER GEOLOGISTS AND HYDROLOGISTS on November 1 & 2, 1983

Send written responses to: CASPER MX DEPLOYMENT CONCERNS
C/O: Carol Schurz
3061 Summit Place
Casper, Wyoming

water quality problems near Wheatland. High total dissolved solids levels restrict use for drinking water purposes, but surface quality is acceptable for other uses. One Launch Control Facility and 13 Launch Facilities are in the watershed. Existing erosion is estimated at 1,770,000 T/yr with 251,000 T/yr reaching the stream.

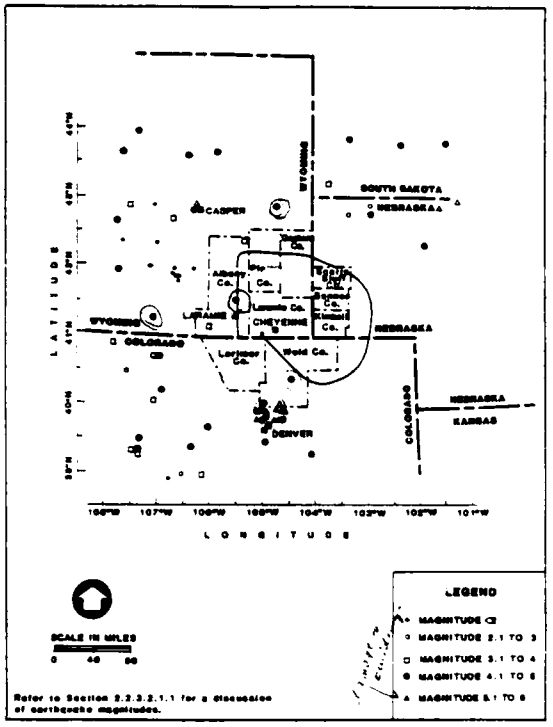
Four Launch Facilities are located in the Goshen Hole area that drains about 560 sq mi to the North Platte between the confluence of the Laramie River and the confluence of Horse Creek with the North Platte River. Average flow of the North Platte in this area is about 780 cfs with flow primarily controlled by Wheatland, Glendo, and Guernsey reservoirs. Wastewater discharges include Scottsbluff (2.6 mgd) and Terrytown (0.24 mgd). Water quality is typified by high total dissolved solids that increases significantly in the downstream direction as a result of irrigation return flow. Existing erosion in the 560 sq mi area is estimated at 1,200,000 T/yr with 220,000 T/yr reaching streams or irrigation ditches in the area.

2.2.1.2.4 Groundwater Hydrology and Quality

Groundwater used in the Area of Concentrated Study is derived from alluvium along stream channels and the Ogallala, Antelope, White River (Brule and Chadron), Pierre, and Lance/Fox Hills aquifers. A confined aquifer (Casper Formation) occurs at depth but has not been developed as a water supply source. Groundwater flow is typically west to east trending northeast north of Lodgepole Creek tending to parallel surface drainage patterns. Groundwater quality is highly variable with nitrate exceeding primary drinking water standards in some areas and iron, sulfate, sodium, and total dissolved solids exceeding secondary drinking water standards in other areas.

2.2.1.2.4.1 Crow Creek Watershed

The Ogallala is the most developed aquifer in the Crow Creek watershed and provides most of the water pumped from the Cheyenne well fields. Average values for wells are 330 gallons per minute (gpm) yield, 6.6 gallons per minute per foot (gpm/ft) specific capacity, 2,100 square feet per day (sq ft/day) transmissivity, 85 feet per day (ft/day) hydraulic conductivity, and 2.5×10^{-4} for storativity. The Ogallala is the surficial formation in much of the watershed. The Brule Formation has large yields only in areas of secondary permeability. The Antelope has been removed by erosion in most of the watershed. Large quantities of water are pumped from wells in the Crow Creek alluvium in the Carpenter area where 1,000 gpm wells are common. Some springs (one of about 900 gpm) west of Cheyenne contribute to surface water flow. Recharge to the groundwater basin underlying the Crow Creek watershed above Carpenter is estimated at 21,100 acre-ft/yr (precipitation 16,600; underflow from other areas 500 acre-ft/yr; and streamflow infiltration 4,000 acre-ft/yr). Discharge is estimated at 18,600 acre-ft/yr (irrigation 9,400 acre-ft/yr; municipal/industrial use 2,800 acre-ft/yr; groundwater discharge 2,400 acre-ft/yr; and groundwater outflow to other areas 4,000 acre-ft/yr) resulting in a net gain in groundwater storage. Water levels have been decreasing upstream of Cheyenne and increasing downstream of Cheyenne. Water quality from aquifers in the area is typically good with total dissolved solids less than 500 milligrams per liter (mg/l), but nitrate levels in the Cheyenne vicinity frequently

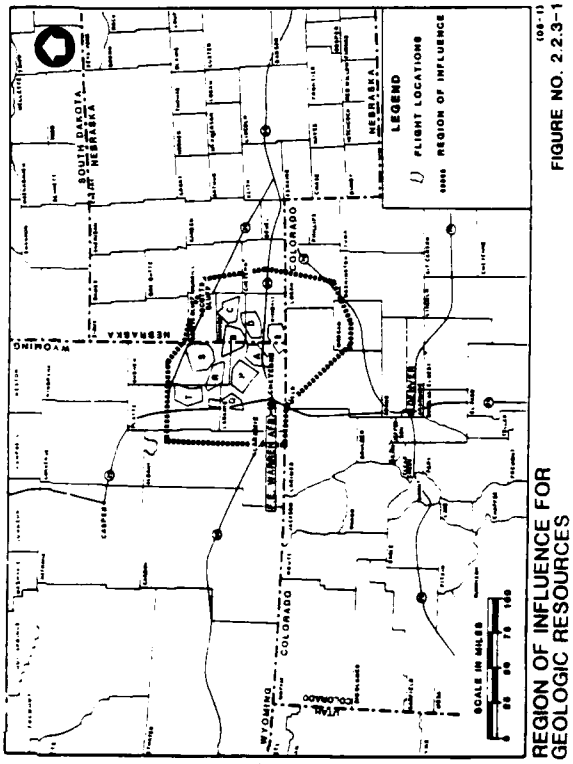


EARTHQUAKES AROUND CHEYENNE, WYOMING THROUGH MAY 1981

(06-2)

FIGURE NO. 2.2.3-2

2-119



(08-1)

FIGURE NO. 2.2.3-1

REGION OF INFLUENCE FOR GEOLOGIC RESOURCES

2-116

Primary data were also supplied as preliminary estimates of available aggregate resources from a report being actively prepared on construction materials for the Deployment Area.

2.2.3.2 Existing Conditions

2.2.3.2.1 Geologic Hazards

Potential geologic hazards which were evaluated in the Region of Influence consisted of regional seismicity, faulting, ground subsidence, landslides, and liquefaction.

Geologic conditions in the Region of Influence are sufficiently described in the literature and maps, previous Peacekeeper Closely Spaced Basing studies, and in communication with local experts to adequately assess the hazards and identify the issues most pertinent to this study. Based on this evaluation, geologic hazards are not considered issues for impact by the project. The potential impact of geologic hazards on the project is presented in section 1.6.10.2.

2.2.3.2.1.1 Regional Seismicity

A plot of recorded earthquakes within about 200 miles of the F.E. Warren AFB is shown on Figure 2.2.3-2 (National Earthquake Information Service 1982). Few natural earthquakes (i.e., not induced) above the microearthquake level, magnitude (M) equals three, have been reported in the vicinity of the Deployment Area. Magnitude is a measure of the total energy released by an earthquake, expressed on an open-ended, logarithmic scale. The largest known magnitudes are near 8.9. National Earthquake Information Service data show only 3 earthquakes within 63 miles of Cheyenne. The largest magnitude listed, M_L=3.5, occurred 62 miles west of Cheyenne. Simon (1972) suggests that the filling of Lake Hattie Reservoir near this shock may have induced the seismic activity. A Modified Mercalli Intensity (MMI) of MMI-IV occurred 50 miles northwest of Cheyenne in 1954. Modified Mercalli Intensity is a numerical index describing the effects of an earthquake on the earth's surface, on man, and on structures. Modified Mercalli Intensity values range from I (not felt or only rarely felt) to XII (total destruction). MMI-IV represents very slight damage to conventional structures which are not designed or constructed to resist earthquakes. The listed earthquake closest to the Deployment Area was a 1967 earthquake of undermined magnitude about 17 miles southwest of Cheyenne. Small instrumentally recorded earthquakes (M_L=3 or less) are typically not listed in the National Earthquake Information Service. Such shocks may be felt at the epicenter but would be well below the damage-causing threshold. Not all seismicity has been reported in the National Earthquake Information Service; small earthquakes in the range of Intensity III to VI have been reported in western Nebraska (Reagor et al. 1981, Figure 2.2.3-2) near the Chadron Arch. Although the numbers and magnitudes of these events are sparse, a general southeast trend of several events has led some researchers to speculate an association with the Chadron Arch.

In summary, based on the historic record, seismic activity in the Deployment Area is very low. Algermissen and Perkins (1976) and Algermissen et al. (1982) indicate that the 475-year return period (10 percent chance of exceeding in 50 years) design acceleration would be about 0.04g for the Cheyenne area. A similar study for the Rocky Mountain states by Liu and DeCapua (1975) indicates a design value of about 0.02g for a 200-year period. These studies are based on historic seismicity distributed over judgmentally determined seismic source zones usually corresponding to physiographic or seismotectonic provinces.

2-118

2.2.3.2.1.2 Faulting

The Wheatland-Whalen Fault Zone (Morris and Babcock 1960) has been classified as active based on an early USGS field study of a single exposure using one age date to establish the last age of fault movement (McGrew 1962, Figure 2.2.3-3). The criteria for recognizing an active fault, as summarized by Cluff et al. (1972) include, but are not limited to, the presence of fault scarps, offset streams, fault valleys, or folding or warping of young deposits. Usually a combination of these and other features is generated by fault movements at the surface. Stratigraphic offset of Quaternary sediments by faulting is indicative of an active fault.

Spatial alignment of instrumentally located earthquakes may indicate an active fault, although absence of earthquakes is not sufficient to preclude an active classification. Historical accounts of large earthquakes can sometimes be used to document past earthquakes.

The trace of the Wheatland-Whalen Fault Zone trends northeast through T-flight and S'lo T-2 lies within the fault zone itself while Silo T-3 is located close to the zone and T-9 lies along its projection. If active, there will be potential for ground rupture in the area of the fault zone.

2.2.3.2.2 Energy and Mineral Resources

This study evaluated the project impact on a number of energy and mineral resources: oil, gas, uranium, aggregate, coal, base and precious metals, and geothermal. With the exception of aggregate, all the remaining energy and mineral resources within the Region of Influence were not affected by the project for one or more of the following reasons: they are not known to exist within the Region of Influence or, if they exist, are in uneconomic quantities, they are already being produced and successfully coexist within the current Deployment Area configuration; and they are capable of being produced with little or no loss due to the project. Aggregate in the Region of Influence is an abundant resource but is identified as an impact because considerable quantities will be required for construction.

Aggregates must meet established standards of abrasion resistance, chemical compatability, and soundness to be suitable for use in concrete. The requisite characteristics of aggregates for use in roadbeds are less rigorous, but resistance to abrasion is nevertheless important.

Sand and gravel deposits are present in the floodplains of the major drainages and are found in the southeastern portion of Laramie County, along Lodgepole Creek in Kimball County, Spring Canyon in Banner County, along the North Platte River in Platte, Goshen, and Scotts Bluff counties, along the South Platte River

2-120

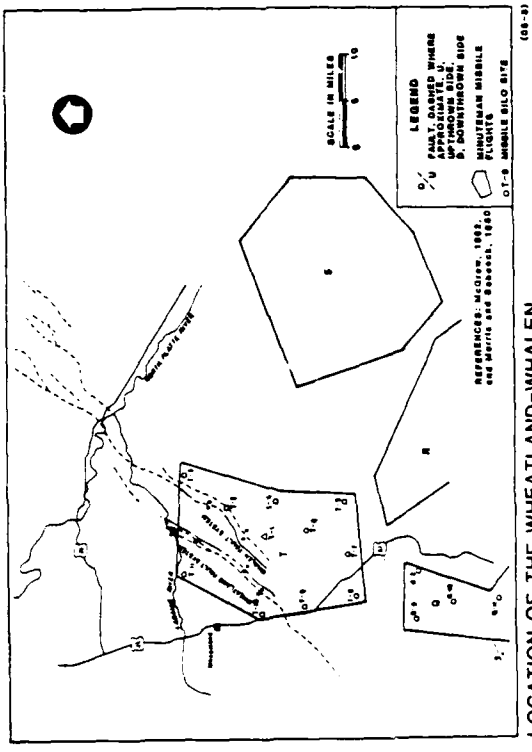


FIGURE NO. 2.2.3-3

LOCATION OF THE WHEATLAND-WHALEN FAULT SYSTEMS

2-121

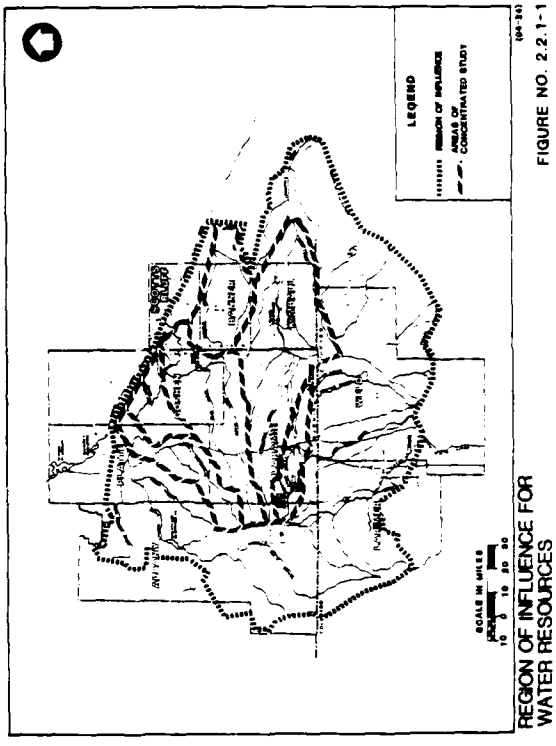


FIGURE NO. 2.2.1-1

REGION OF INFLUENCE FOR WATER RESOURCES

2-92

Crow Creek Watershed. It is assumed that construction water demands at F.E. Warren AFB and induced water demands will be supplied by the Cheyenne Board of Public Utilities. The impact of construction water demands in the Cheyenne Urban Area is negligible since little or no project construction will occur there. The impact of the project on the Cheyenne area is shown in Figure 3.2.1-1. The ability of Cheyenne's water system to supply the water necessary to satisfy the demands is somewhat limited in the initial project years. In 1986, the project will result in a water shortage of 180 acre-ft, rather than a surplus of 540 acre-ft, as projected under baseline conditions. After 1985 the effect of the project is to reduce the amount of surplus water available for increasing storage in Crow Creek reservoirs. The long-term operating demand will create a water shortage 1 year earlier with the project than without it. Several alternatives (i.e., increased pumpage of wells, modifications to raw water delivery system, wastewater reuse at F.E. Warren AFB, purchase of existing water rights) are being examined to increase water supply or reduce water demand for the Cheyenne Urban Area in water supply planning for the project (Ertec 1983). The induced water demands will result in a short-term, moderate, significant impact for the Cheyenne Urban Area since minor new facilities may be required and reduction in water availability to existing users could occur. Short-term impacts are rated low and not significant for F.E. Warren AFB since demands will only require increased operation of facilities and will not interfere with existing users. Negligible impacts will occur in the Crow Creek watershed in the short and long term. Low, long-term not significant impacts will occur in the Cheyenne Urban Area due to the 1-year earlier required development of a new water supply.

Other Areas. Water supply for construction and induced demand in the Deployment Area is assumed to come from wells. Construction water is to be supplied by development of new groundwater supplies or purchase or temporary use of existing water rights following procedures of the states. Because of the short-term limited use, no long-term effects are anticipated. Existing water supplies in all potentially impacted communities are adequate to meet increased demands of the induced population but increased operations may cause a low not significant short term impact. Water development may require construction of minor new facilities so impacts are rated moderate for the site and local levels, but since facilities would not interfere with existing users the impacts are not significant.

3.2.1.4.2 Constraints on Water Use

3.2.1.4.2.1 Baseline Future - No Action Alternative

No change in controls on water use or water quality protection are forecast. Additional water rights may be required to meet forecast demands and increased use could impact existing water rights.

3.2.1.4.2.2 Proposed Action

No change in controls on water use or water quality protection are forecast as a result of the Proposed Action or project alternatives so negligible not significant impacts are expected.

3-224

The total inflow from Crow Creek above current diversion facilities is estimated at 9,000 acre-ft/yr of which 4,600 acre-ft/yr is currently used with the remainder evaporating, bypassing diversion points, or spilling over dams at diversion facilities. Spillage and bypass help to recharge the groundwater basin from which municipal wells obtain their supply.

A variety of water conservation programs have been proposed in the Area of Concentrated Study. They include measures to reduce outdoor irrigation use, meter all users, adopt accelerated rate schedules, and encourage use of water saving devices (Cheyenne Water Conservation Advisory Group 1982). A plan to reuse wastewater to irrigate the F.E. Warren AFB golf course has also been proposed (Baker, Sweeney and Associates 1981).

A goal of using 2,000 acre-ft/yr for municipal supply from the Cheyenne well fields has been established (Cheyenne Board of Public Utilities 1983). The true production capability of the well fields is unknown, but a program has been established to better define this capability (Ertec 1983).

2.2.1.2.1.2 Other Areas

Water use in Platte, Goshen, Laramie, Banner, Kimball, and Scotts Bluff counties is about 760,000 acre-ft/yr with about 88 percent used for agricultural purposes. Existing Minuteman Launch Control Facilities in the Deployment Area use 12 acre-ft/yr. Table 2.2.1-1 summarizes current water supply and water use in communities potentially impacted by increases in demand due to population immigration.

Total municipal use in these areas averages about 250 gpcd but there is considerable variation depending on the extent of industrial use. Water supply sources for all communities in the Area of Concentrated Study except for Cheyenne is from wells.

Table 2.2.1-1

WATER SUPPLY CAPACITY AND WATER USE IN POTENTIALLY IMPACTED COMMUNITIES

Community	Current Capacity (Acre-Ft/Year)	Current Use
Greeley	50,000	21,400
Fort Collins	38,000	16,800
Laramie	11,800	6,000
Scottsbluff	11,000	4,400
Torrington	8,500	4,800
Goring	8,500	3,100
Wheatland	3,800	2,000
Pine Bluffs	2,700	500
Kimball	2,100	1,000

2-87

PROJECT IMPACT ON CHEYENNE URBAN WATER SUPPLY

FIGURE NO. 3.2.1-1

3-225

Table 3.2.1-2

CHEYENNE BASELINE MUNICIPAL WATER DEMANDS

	1983	1984	1985	1986	1987	1988	1989	1990	1991
Water Demand (Acre-ft)									
Industrial	2,500	2,600	2,700	2,800	2,900	3,000	3,100	3,200	3,300
Nonindustrial	12,080	12,240	12,400	12,560	12,730	12,890	13,050	13,210	13,370
TOTAL	14,580	14,840	15,100	15,360	15,630	15,890	16,150	16,410	16,670
Water Supply (Acre-ft)									
Net Import from Douglas Creek[1]	1,510	4,120	8,850	10,430	10,430	10,430	10,430	10,430	10,430
Crow Creek Watershed[2]	4,150	4,520	4,790	4,840	4,840	4,840	4,840	4,840	4,840
Municipal Wells[3]	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000
TOTAL	7,660	10,640	15,640	17,270	17,270	17,270	17,270	17,270	17,270
Supply Demand	-6,920	-4,200	540	1,910	1,640	1,380	1,120	860	600

Note: 1 Net import downstream of reservoirs. Net inflow to reservoirs is 2,100 acre-ft in 1983, 5,080 acre-ft in 1984, 10,080 acre-ft in 1985, and 11,210 acre-ft in later years. Water diversion from Douglas Creek will be 2,600 acre-ft in 1983, 5,500 acre-ft in 1984; 10,700 acre-ft in 1985; and up to 12,400 acre-ft in 1986 and later years.

2 Crow Creek watershed supply equals 1,220 acre-ft/yr from North Crow and inflow to the Middle Crow reservoirs, less a share of existing evaporation and spillage losses which are apportioned based on the percent of total flow to the reservoirs from import water and watershed inflow.

3 Assumes total pumpage is reduced to 2,500 acre-ft/yr, and irrigation use remains at 500 acre-ft/yr.

3-222

Table 3.2.1-3

PROJECT WATER REQUIREMENTS

	1984	1985	1986	1987	1988	1989	TOTAL
Construction Water Demands (Acre-ft)							
F. E. Warren AFB	13	49	5	-	-	-	67
Deployment Area	8	160	179	94	8	-	449
Nebraska Section	-	-	56	86	5	-	149
Wyoming Section	8	160	123	6	3	-	300
TOTAL:	21	209	184	94	8	-	516[b]
Induced Water Demands[a] (Acre-ft)							
Cheyenne	-	684	773	808	410	382	3,057
Deployment Area	-	-	121	147	57	59	384
Nebraska Section	-	-	106	67	16	40	229
Wyoming Section	-	-	15	80	41	19	155
TOTAL:	-	684	894	955	467	441	3,441

Note: a A continuing operating demand in Cheyenne of 209 acre-feet/yr is expected in 1990 and later years. The Launch Control Facilities will continue to use 12 acre-feet/yr in the Deployment Area.

b Includes 100 percent for contingencies.

3-223

Other Areas

Stormwater Runoff and Drainage A potential increase at the site level is calculated to be 2.8 percent over existing conditions resulting in a low level of impact that is not significant because the increase will not endanger public safety. No significant changes will occur at the local or regional level.

Erosion and Sedimentation Erosion increases at the site level for Launch Facility, Launch Control Facility, and Defense Access Roads will be 16 to 19 percent and 0.15 to 0.2 percent at the local level. All construction related to the project could cause increases of 0 to 1 percent at the regional level if erosion is not controlled. Application of assumed mitigations will result in negligible impacts for the proposed project and project alternatives.

Wastewater Discharges Low short-term impacts will occur due to increased operation of existing facilities to treat wastewater from immigrating people. Since public health will not be endangered the impacts are rated not significant.

Surface Water Flow No change in surface water flow is expected as a result of the project so impacts are rated negligible and not significant.

3.2.1.4.4 Groundwater Hydrology and Quality

This section evaluates future conditions with and without the project for groundwater hydrology and quality.

3.2.1.4.4.1 Baseline Future - No Action Alternative

Crow Creek Watershed Increasing pumpage from Cheyenne well fields could cause reduced flow in springs and in Crow Creek, as well as lower water levels in existing wells. The City of Cheyenne has determined that groundwater withdrawal rates of 2,000 acre-ft/yr for municipal use will not result in further water level declines (Cheyenne Board of Public Utilities 1983-a). However groundwater declines of 3 to 5 feet per year could result in groundwater pumpage increases to approximately 4,000 to 5,000 acre-ft/yr to meet shortages in water supply in 1983 and 1984 based on past groundwater modeling in the area (Crist 1980). Completion of current Stage II facilities will allow recovery of the groundwater system after 1985. Continued discharges of wastewater to Crow Creek will continue to increase total dissolved solids and nitrate levels in groundwater downstream of Cheyenne.

Other Areas Generalized localized patterns of water level declines are expected to continue with increasing pumpage of groundwater.

3.2.1.4.4.2 Proposed Action

Crow Creek Watershed Use of the Cheyenne well field to meet shortages caused by the project (a pumpage rate of 2,200 acre-ft/yr for municipal use in 1985) could cause a slight decrease in water levels and a slight decrease in flow in Crow Creek.

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These amounts of water level lowering which will only occur in the short term are rated as low and not significant since the lowering will not likely interfere with existing users. Use of the wells will not alter regional groundwater quality. Increases in wastewater discharges will have a low and not significant impact on groundwater quality at the local and regional level. The Proposed Action or project alternatives at F.E. Warren AFB are not expected to influence groundwater hydrology or quality.

Other Areas. The potential water level lowering 1,000 and 5,000 feet away from a construction well following 1 year of continuous pumping at 100 gpm was evaluated using equations of groundwater flow for typical aquifer parameters for the Ogallala and Arikaree aquifers with results given below:

	1,000 ft	5,000 ft = 1 mile
	(Feet of Lowering)	
Ogallala	15	002
Arikaree	30	001

These levels will only cause low and not significant impacts since the loweringg will not interfere with the existing users.

No changes to regional groundwater quality are expected as a result of project activities in the Deployment Area.

Low, not significant impacts could occur as the result of increasing wastewater discharges in the short term at the site and local level.

The impact of wells developed to supply Deployment Area construction demands will depend on site-specific hydraulic characteristics, well construction and efficiency, and proximity to existing wells, springs, and streams. Determining precise impacts will require monitoring during construction.

3.2.1.5 Summary of Impacts

This section presents a summary of impacts expected under the Proposed Action and project alternatives based on the analysis of Section 3.2.1.4 and the level of impact definitions and significance determination criteria presented in Sections 3.2.1.2 and 3.2.1.3.

3.2.1.5.1 Explanation of Detailed Impact Matrix

Figure 3.2.1-2 provides a summary assessment of the level and significance of impacts to the Water Resource elements and subelements. The project will only cause significant impacts in the Crow Creek watershed with no significant impacts expected in the Deployment Area. Significant, short-term, moderate impacts are expected for the induced demand subelement of the water use and demand element in the local area of the Crow Creek watershed since project changes could interfere with existing users in the Cheyenne Urban Area. Significant, short and long-term moderate impacts are expected for the erosion and sedimentation subelement of the surface water hydrology and quality element. Significant, short

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CENTER FOR LAW
IN THE PUBLIC INTEREST

November 23, 1983

AFRCE-BMS/DEV
Norton AFB, California 92409

Re: Draft Environmental Impact Statement for
Peacekeeper in Minuteman Silos

Dear Sir or Madam:

As you no doubt are aware, this office acts as litigation counsel for twelve organizations in the lawsuit styled Friends of the Earth, et al. v. Weinberger, et al. (D.C. Cir. No. 83-1438), now pending in the United States Court of Appeals for the District of Columbia and set for oral argument December 6, 1983.

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Our contentions concerning what the law requires have been set out in considerable detail in that lawsuit (copies of our briefs in which are attached). We submit those comments to reinforce your awareness of our position as to what must be included within this and other MX EISs and so as to waive no rights in anticipation of the eventual justification of our position in court.

Yours truly,

Nicholas C. Yost

NCY/bv
Enclosures

IN THE UNITED STATES COURT OF APPEALS FOR
THE DISTRICT OF COLUMBIA CIRCUIT

No. 83-1438

FRIENDS OF THE EARTH, INC., et al.,
Plaintiffs-Appellants

v.

CASPAR W. WEINBERGER, et al.,
Defendants-Appellees

On Appeal from the United States District Court
For the District of Columbia

Honorable Barrington D. Parker, Judge Presiding

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v.

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On Appeal from the United States District Court
For the District of Columbia

CERTIFICATE REQUIRED BY RULE 8.c:

The undersigned, counsel of record for the Plaintiffs-Appellants, certifies that the following listed parties and amicus appeared below:

FRIENDS OF THE EARTH, INC. (Plaintiff-Appellant)
COMMITTEE FOR A SANE NUCLEAR POLICY (Plaintiff-Appellant
COUNCIL FOR A LIVABLE WORLD (Plaintiff-Appellant)
ENVIRONMENTAL ACTION, INC. (Plaintiff-Appellant)
FARMERS EDUCATIONAL AND COOPERATIVE UNION OF
AMERICA, ROCKY MOUNTAIN DIVISION (Plaintiff-Appellant)
GREENPEACE, U.S.A. (Plaintiff-Appellant)
NEBRASKANS FOR PEACE (Plaintiff-Appellant)
SIERRA CLUB (Plaintiff-Appellant)
TRI-STATE MX COALITION (Plaintiff-Appellant)
UNITED CHURCH OF CHRIST, OFFICE FOR CHURCH

IN SOCIETY (Plaintiff-Appellant)
WESTERN SOLIDARITY (Plaintiff-Appellant)
WYOMING CHURCH COALITION (Plaintiff-Appellant)
CASPAR W. WEINBERGER (Defendant-Appellee)
VERNE ORR (Defendant-Appellee)
WASHINGTON LEGAL FOUNDATION (Amicus on behalf of Defendants)

These representations are made in order that Judges of this Court, inter alia, may evaluate possible disqualification or recusal.

Nicholas C. Yost
Counsel of Record for
Plaintiffs-Appellants

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IN THE UNITED STATES COURT OF APPEALS FOR

THE DISTRICT OF COLUMBIA CIRCUIT

No. 83-1438

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Plaintiffs-Appellants

v.

CASPAR W. WEINBERGER, et al.,

Defendants-Appellees

On Appeal from the United States District Court
For the District of Columbia

Honorable Barrington D. Parker, Judge Presiding

BRIEF FOR APPELLANTS

INTRODUCTION

This case challenges the continuing and stubborn refusal of the United States Air Force and Department of Defense to perform the appropriate environmental impact studies required by the National Environmental Policy Act 42 U.S.A. §4321 et seq. ("NEPA") on what may be the most environmentally significant military program ever undertaken -- the MX missile system.

The decade of the 1970's saw the application of NEPA to all agencies of the federal government, and to every federal policy, plan, program, or project significantly affecting the quality of the human environment. See 40 C.F.R. 1508.18(b). These new NEPA procedures brought profound changes in the federal decision-making process, resulting in better coordination among the federal agencies, in more effective public participation, and in improving the environmental sensitivity of government decisions generally.[1]

This impressive record of success has been achieved, however, only through rigorous judicial oversight of federal agency NEPA procedures and performance. See Yost, Streamlining NEPA - An Environmental Success Story, 9 B. C. Envt'l. Aff. L. Rev. 507 (1981-82). Especially during the early 1970's, the record of agency compliance with NEPA was poor, in large part due to fears that NEPA would expose agency decisions to greater public scrutiny and would require greater consultation and coordination with federal agencies with differing missions. But by the late 1970's, the compliance with NEPA of even the most

[1] Council on Environmental Quality (CEQ), Environmental Impact Statements - An Analysis of Six Years' Experience by Seventy Federal Agencies (1976); Council on Environmental Quality, Environmental Quality, Tenth Annual Report at 57 (1979); Council on Environmental Quality, Environmental Quality, Eleventh Annual Report at 371-373 (1980); Council on Environmental Quality, Environmental Quality, Twelfth Annual Report at 172-173 (1981); Caldwell, Science and the National Environmental Policy Act, Redirecting Policy through Procedural Reform, 51, 74, 131, 133, 137, 150-151 (1982).

resistent agencies had improved measurably. Council on Environmental Quality, Eleventh and Twelth Annual Reports, supra.

Nevertheless, a handful of federal agencies - notably those charged with handling military-related affairs - have remained recalcitrant and particularly begrudging in their approach to NEPA. (The Defense Department has moved into first place as the Federal agency most sued for violations of NEPA. Council on Environmental Quality, Environmental Quality, Thirteenth Annual Report at 234 (1982).) Over the years the courts have rejected bald assertions by these agencies that they are somehow exempt from NEPA and have instead held that they must comply with both the letter and the spirit of NEPA and its implementing regulations. Concerned About Trident v. Rumsfeld, 555 F.2d 817 (D.C. Cir. 1977); see People of Enewetok v. Laird, 353 F.Supp. 811 (D. Hi. 1973). Thus, cases such as this one are essential to ensure continuing compliance with NEPA.

This case presents one of the most blatant examples of a military agency improperly seeking blanket NEPA exemptions for activities that may have potentially the severest of environmentally significant impacts. The Air Force is apparently willing (in a limited way) to examine the environmental effects of the MX missile system if unused, but not the effects if used or in case of an accident. The Air Force has steadfastly refused to consider the potentially

devastating "worst case" environmental impacts that could result from an accident or from use of the MX weapons system, either deliberately or by mistake. Instead, the Air Force has consciously limited the scope of its environmental impact statements ("EIS") to the routine impacts of engineering feasibility studies and various basing modes for the MX - always assuming that all such missiles will simply remain unused in their silos and always disregarding the possibility of an accident. This grudging compliance is not enough. The widespread public interest in the impacts of the MX missile is not primarily a product of the number of gophers displaced by digging a hole in the ground for a silo. This interest exists, whether the concerned citizen is pro, con, or undecided, because the MX is a strategic nuclear weapons system, the impacts of which on the "human environment" (NEPA, 102(2)(C)) are potentially catastrophic. Nevertheless, the Air Force continues to treat the MX like just another runway extension or base closure. Wearing such self-created blinders lacks warrant in either reality or law. It is directly contrary to NEPA and to the NEPA Regulations' requirement that low probability/severe consequence environmental impacts be studied in an environmental impact statement. Indeed, the MX missile, by virtue of the sheer magnitude of its potential impact, is a paradigm of the need to follow the required NEPA procedures for rigorous study, inter-agency coordination, and public participation as a precondition of informed decisionmaking.

We submit that the difficult issues now before this Court have already been decided -- that this case is controlled by two decisions --Concerned About Trident v. Rumsfeld, supra, 555 F.2d 817 (D.C. Cir. 1977) (rejecting the attempt to exclude actions involving national security from the mandates of NEPA) and Sierra Club v. Sigler, 695 F.2d 957 (5th Cir. 1983) (requiring NEPA analysis of low probability/severe consequence environmental impacts using worst case analysis).

The controversial nature of the MX system has resulted in constantly shifting Air Force and Defense Department proposals regarding MX's basing mode -- ranging from the Multiple Protective Shelter (MPS) mode (commonly called the "racetrack") to the Closely Spaced Basing (CSB) mode (commonly called "Dense Pack") to the present proposal to place the MX in existing Minuteman silos, a mode which the Air Force in a previous environmental impact statement thought unworthy of extended discussion. These recurrent shifts in basing mode prompted Congress in late 1982 to enact the so-called "Jackson Amendment" to the Military Appropriations Act of 1983, requiring the President to report to Congress in early 1983 on his latest MX recommendations and exempting that report - and only that report - from the requirements of NEPA.

Plaintiffs in their complaint sought relief from the government's NEPA violations as to both (1) the Dense Pack basing mode and (2) the decision to procure, produce, and deploy

the whole fleet of MX missiles. Despite the clear statutory language and the weighty appellate authority that NEPA exemptions are to be narrowly construed, the court below improperly expanded the exemption in the Jackson amendment (which was limited by its terms to the President's report) so as to exempt the entire MX missile system from NEPA.

Plaintiffs on appeal do not pursue their allegations concerning the government's NEPA violations as to the Dense Pack basing mode, because they are moot in fact, the mode having been universally rejected. But the more important and fundamental issues relating to the remainder of plaintiffs' complaint -- the potentially devastating environmental impacts of the MX missile itself -- remain very much "live." The District Court's ruling erroneously insulates the MX system from NEPA compliance for all future Congressional consideration -- annual authorization requests, for example, typically cause Congress to revisit these issues yearly -- and also exempts from NEPA all future Air Force and Defense Department decisions regarding the on-going procurement, basing, and deployment of the MX system, perhaps the most controversial and environmentally significant weapons system ever proposed.

STATEMENT OF ISSUES PRESENTED

Whether the court below erred in construing the National Environmental Policy Act (NEPA) and the implementing Council on Environmental Quality NEPA Regulations together with a narrow

exemption to NEPA (which on its face is confined to exempting a particular report) so as to exempt from NEPA the entire proposal to proceed with the MX missile system, thereby eliminating any examination of the environmental impact of the system in case of accident or of actual use and eliminating comparisons with alternatives not under the jurisdiction of the Air Force.

RULE 8(b) STATEMENT

This case has not previously been before this Court, nor is it related to another case, to counsels' knowledge.

REFERENCES TO PARTIES AND RULINGS

This appeal is taken from the Final Order and Judgment (MR. 33)[2] explained in a Memorandum Opinion of Judge Barrington Parker (MR. 32), both entered April 12, 1983. (App. pp. 76, 97.)

STATEMENT OF THE CASE

Plaintiffs filed this action on January 12, 1983. (App. p. 3) The complaint sought declaratory and injunctive relief requiring the Air Force to analyse the "worst case" environmental impacts of the MX system if used, either deliberately or accidentally, and to compare the potential environmental impacts of the MX system with alternative missile systems not administered by the Air Force (such as "sea based" or "no action" alternatives). Complaint, MR.1, ¶¶ 93, 94, 98, (App. pp. 60, 63); see Id., ¶¶ 98-101, (App. pp. 61-66); Prayer

[2] MR. refers to the Docket entries in the District Court. Unless the context requires otherwise we have referred to all Plaintiffs-Appellants collectively as "Plaintiffs" and to both Defendants-Appellees as the "government."

for Relief at ¶ B (App. pp. 70-71), D App. pp. 72-74), and F (App. pp. 74-75). Additionally, the complaint alleged that the Air Force and the Defense Department attempted to shortcut the requirements of NEPA in numerous specified instances with respect to a legislative environmental impact statement prepared on Dense Pack. (Id. at ¶¶ 87-92, App. pp. 57-59. As stated above, we do not belabor these violations in that the basing mode then proposed has, with further scrutiny, now been discarded.)

Plaintiffs' motion for expedited discovery was granted in part. (Order dated February 7, 1983, MR. 12, App. p. 3.) Subsequently, plaintiffs moved for partial summary judgment and for preliminary relief regarding their claims that the Dense Pack legislative EIS was legally inadequate. (MR. 19, MR. 16, App. p. 4.) The government moved for both summary judgment and to dismiss plaintiffs' case in its entirety. (MR. 13, MR. 26, App. pp. 3-4.)

These motions were argued on March 9, 1983, after which the District Court took the matter under submission for approximately one month. (Reporter's Transcript, pp. 1, 84; App. p. 3; MR. 32 & 33; App. pp. 76-97.) During that time, on April 11, 1983, the "Scowcroft Commission" issued its report to the President, which the President thereafter adopted and forwarded to Congress as the report called for by the Jackson Amendment (p. 5, supra). (Memorandum Opinion, MR. 32, p. 10, App. p. 85, see App. pp. 221-222.) This report recommended

abandoning Dense Pack and, instead, placing MX missiles in existing Minuteman silos until a better system could be developed. (App. pp. 221-222.) On the next day, April 12, 1983, the District Court issued its Memorandum Opinion and Final Order and Judgment granting the government's motion to dismiss the case in its entirety. Memorandum Opinion and Final Order and Judgment, NR. 32 and 33, App. pp. 76-97. The District Court ruled that plaintiffs' claims were "moot" because the Jackson Amendment generally exempted the Air Force and Defense Department from complying with NEPA. Id. The order failed to distinguish between its treatment of the Dense Pack claims and the MX claim. Id.

On April 22, 1983, plaintiffs filed their notice of appeal. App. p. 5.

Plaintiffs do not on appeal pursue those claims relating to Dense Pack (CSB) - not for the reasons stated by the District Court (that the Jackson amendment mooted all NEPA claims) - but because the government's violations of NEPA with respect to Dense Pack appear to have ripened into mootness in fact.[1]

---

[1] Claims 1-6 Complaint, NR. 1, ¶¶ 87-92, App. pp. 57-59) related to the now abandoned "Dense Pack" basing mode, while claim 7 Id. ¶¶ 93-94, 100-101, App. pp. 60, 63-66.) related to the MX generally. The Court below was well aware of the distinction, but its Order and Judgment covered the "th MX" claim as well as the Dense Pack claims. (Memorandum Opinion, NR. 32, p. 3, n.2, App. pp. 78, 97.

The MX missile proposal is, however, far from moot. It was a proposal; it never ceased to be a proposal; it is a proposal.[4] Moreover, MX was, never ceased to be, and is appellees' favored proposal for a land based intercontinental ballistic missile system. Appellees' violations of NEPA with respect to the MX are alive and continuing. It is with respect to the proposal for the MX missile system itself that plaintiffs respectfully seek relief from this Court.

STATEMENT OF FACTS [5]

a. Chronology

Over a period of a decade, the Air Force has studied and developed a new intercontinental ballistic missile (ICBM) known as "MX" for missile experimental. (Complaint, NR. 1, ¶¶ 18-19,

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[4] To quote defendant Weinberger:

> Senator Pell. In the past 2 years in connection with the MX, over the last 18 months was any serious thought given within the administration to abandon MX?
>
> Secretary Weinberger. No. I do not think so, sir. . . .

Hearings on U.S. Strategic Doctrine Before the Committee on Foreign Relations, United States Senate, 97th Cong. 2d Sess., at 136 (Dec. 14, 1982); see H.R. Rep. 98-107, Department of Defense Authorization Act, 1984, 98th Cong. 1st Sess. 14, 144-146 (1983).

[5] In the interest of clarity and given the narrowing of issues on appeal (by reason of dropping the Dense Pack allegations), the facts are abbreviated here. They are set out more fully in the Complaint (by chronology in ¶¶ 18-72 and by description of environmental and other impacts in ¶¶ 95-107 (App. pp. 23-42, 61-69)).

On a motion to dismiss, pursuant to Fed. R. Civ. Proc. 12(b), all material allegations of the Complaint are to be taken

App. pp. 23-25. This study began in approximately 1971 when officials within the Defense Department perceived a need for a new land based ICBM with greater accuracy and nuclear payload capacity than the presently deployed Minuteman missile. (Id. at ¶ 19, App. p. 25.)

After considerable preliminary research the Air Force refined its plans. (Id., ¶¶ 19-24, App. pp. 25-26.) In 1976 the Secretary of Defense directed the Air Force to proceed with the validation phase of two basing alternatives: the horizontal shelter and the buried trench. (Id., ¶ 24, App. p.26.) DOD regulations describe this "Milestone I Decision," [6] as involving the selection of an alternative system for demonstration and validation. (Id.)

(footnote 5 continued)

as true and construed in favor of the complaining party. See Warth v. Seldin, 422 U.S. 490, 501 (1975); Jenkins v. McKeithen, 395 U.S. 411, 421 (1969); 2A J. Moore, Fed. Practice ¶¶ 12, 15, at 2343-50 (2d ed. 1974) and cases cited. For the limited purpose of considering the merits of the government's motion to dismiss, the trial court was required to assume plaintiffs' allegations were true. (Memorandum Opinion, NR. 32, p. 11, n.9, App. p. 86.)

Given the factual complexity of the case the Statement of Facts has been subdivided into: (a) chronology, (b) demands upon the government regarding scope of EIS, (c) limitations of the scope of the government's EIS, (d) the government's promises regarding future EISs, (e) the proposal to proceed with the MX and (f) the environmental effects of the MX in case of accident or use.

[6] Applicable regulations speak in terms of several "milestone" decisions which direct major weapons systems programs from the conceptual stage through the research and development stage to the production and deployment stage. (Complaint, NR. 1, ¶ 22, App. pp. 25-26.)

Over the following several years the Air Force engaged in some efforts to comply with NEPA with respect to proposals tangential to the proposal to proceed with the MX itself -- engineering development of the MX and now discarded basing modes for the MX. The Air Force, while having promised to do so, has to date failed to comply with NEPA with respect to its far more critical proposal to proceed with the MX system itself -- to procure, produce, and deploy a fleet of MX missiles.

In 1977 and 1978 the Air Force analyzed in an EIS a since discarded type of test basing (Id., ¶¶ 25, 29, App. pp. 26-27). This was followed (also in 1978) by an EIS entitled "MX: Milestone II," discussing both (a) the environmental impact of the full scale engineering development (FSED) of MX missile hardware and (b) those basing alternatives which the Air Force had seriously considered to date (all of which have since been abandoned). (Id., ¶¶ 30-31, App. pp. 27-30.) In addition to the alternatives discussed in detail, the government rejected four additional alternatives (including the one the government currently proposes - using existing silos for MX deployment) on the grounds that they lacked the necessary survivability in the event of an attack, were deemed not cost effective, or were impractical with present technology. (Id.; see also Memorandum Opinion NR. 32, p. 6, n.5, App. 80.) This EIS was (in 1979) the subject of a supplement on a basing alternative which the Air Force had previously considered infeasible - air mobile launch. (Id., ¶ 33, App. p. 30.)

Later that same year the President announced that the decision had been made to proceed with fullscale engineering development, the final stage of research and development of MX missile hardware. (Id., ¶ 35, App. p. 31.) Thereafter the government chose the "racetrack" configuration as the preferred basing mode, describing it as a "sheltered, road mobile system to be constructed in (the) western desert." (Id., ¶¶ 35, 37-38, App. p. 31.) (A linear configuration for the shelters later replaced the circular one. (Id., ¶ 43, App. p. 32.)) In 1980, acquisition of the land necessary to deploy the MX in Utah and Nevada in this mode was the subject of a draft EIS. (Id., ¶ 47, App. p. 34.)

With the change of administration the new Secretary of Defense rejected the previous basing mode and described three basing modes he would consider (all of which have since been rejected). (Id., ¶¶ 48, 50, App. p.34.) DOD announced in late 1981 that, as an interim measure, it intended to put the MX missiles in existing Minuteman silos. (Id., ¶ 52, App. p. 35.)

After various exchanges between the Congress and the Executive (Id., ¶¶ 54-64, App. pp. 35-38), the Departments of Defense and Air Force in November, 1982, prepared their recommendation or report on the selection of a basing mode, which was then forwarded to the President, who, on November 22, 1982, officially announced the adoption of Dense Pack, to be located somewhere in southeastern Wyoming. (Id., ¶ 65, App. p. 38.) No environmental impact statement either accompanied the

decision or was filed on the environmental impacts of MX production and deployment. (Id., ¶66, App. p. 39.) On December 8, 1982, the Air Force filed a "legislative environmental impact statement," which did not compare the environmental impacts of Dense Pack with the other alternative basing systems previously analyzed in other environmental impact statements and which did not examine the effects of the MX itself, but examined location only and failed to follow the required NEPA procedures in numerous respects. (Id., ¶ 70, App. p. 39.)

After various votes in committee and on the floor (Id., ¶¶ 67, 68, 70, App. p. 39), in late December, 1982, both Houses of Congress adopted a Joint Resolution (which includes the "Jackson Amendment") appropriating funds for, among other things, the MX research, development, test and evaluation for fiscal year 1983. (Id., ¶ 72, App. pp. 40-42; see App. p. 131.). In so doing Congress deleted entirely the amount for MX missile procurement, and provided that, until after a Presidential report and until after a Congressional resolution approving a specific basing mode, no sums for full scale engineering and development could be obligated or expended and no flight testing of the MX missile could be conducted. (Id.)

The President appointed an advisory commission ("Scowcroft Commission") which reported to him on April 11, 1983, recommending the use of existing Minuteman silos for the MX. (Memorandum Opinion, NR. 32, p. 10, App. p. 85.) On April 19, 1983, the President forwarded the report required by the Jackson Amendment to the Congress. (The President's cover letter is set out at pp. 221-222 of the Appendix.)

The report required by the Jackson Amendment is classified.[7] Only an unclassified 20 page summary was released to plaintiffs and to the public. Although the Jackson Amendment (§7(B), App. p. 103) required the report to include an "assessment of the environmental impact each . . . system or missile would likely have," the resulting "assessment" made available to the public is quoted in its entirety:

> Environmental. An assessment of the environmental impact of a system ranging from socioeconomic to resource impact. Six subfactors used in this assessment are: socioeconomics, biology, air quality, water resources, land use, and cultural resources.

App., p. 233.[8]

On May 26, 1983, the concurrent resolution required by the Jackson Amendment passed, approving the obligation and *expenditure of funds to begin MX missile procurement and full-scale* engineering development of a basing mode for the MX missile. 129 Cong. Rec. H3387 (daily ed. May 26, 1983); 129 Cong. Rec. S7488 (daily ed. May 25, 1983).

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7 Upon request, counsel for the Air Force provided plaintiffs' counsel with copies of the Scowcroft Commission Report, the President's April 19, 1983 cover letter (App. pp. 221-222) and the unclassified "Executive Summary" of the Strategic Forces Technical Assessment Review (App. pp. 223-242). At the same time counsel for the Air Force informed counsel for plaintiffs that the summarized report itself was classified (as the President's letter states (App. pp. 221-222)) and would not be released to plaintiffs' counsel. The record also discloses that from mid 1981 through 1982 substantially all reporting at the Secretary of Defense level was kept oral rather than being put in writing (Politi deposition, NR. 19, pp. 17-18, 25.)

8 Some but not all the missile system alternatives then have an entry such as "increases environmental impacts" (App. p. 235), "substantial environmental impact" (App. p. 236), "environmental impacts would be high during the construction period" (App. p. 238).

b. Demands Upon the Government Regarding Scope of EIS

Throughout this process various of plaintiffs and other members of the public have pressed the government to examine in an environmental impact statement the more significant effects - the environmental impact of the proposal to procure, produce and deploy the MX missile itself, with all its potential environmental impacts, including low probability severe consequence impacts such as an accident or nuclear exchange. (See e.g., Complaint, NR. 1, ¶ 34, App. p. 30; also see ¶¶ 3(d), 4(d), 6(d), 7(d), 9(d), 10(d), App. pp. 12-18; Declaration of Stephen Wheeler, NR. 3; Second Declaration of Stephen Wheeler, NR. 17; Admissions, 18, 25, NR. 14.)

c. Limitations of the Scope of the Government's EIS

Throughout this time the government has examined (in a limited way) the environmental impacts of MX missiles if unused but never if used, either in the case of an accident or of a nuclear exchange. (Complaint, NR. 1, ¶¶ 1, 18, 30; 100, App. pp. 8-9, 23-25, 29, 63-65.) This refusal continues. The Air Force's most recent announcement of NEPA work on the MX missile is confined to the "peacetime" operation of the missile. 48 Fed. Reg. 27123 (Jun. 13, 1982).[9]

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9 The Air Force, presumably embarrassed by the sweep of the District Court's ruling in its favor, now proposes to examine more than the court below would require (but less than the law requires). See 48 Fed. Reg. 27123 (Jun. 13, 1983).

d. The Government's Promises Regarding Future EISs

The government has repeatedly assured plaintiffs and the public generally that it would prepare an environmental impact statement on the proposal to procure, produce and deploy the MX missile system, although persistently refusing to examine the effects of the MX if used as well as if unused.

In 1979 in the Milestone II EIS the government gave the following public assurances:

> If the objectives of FSED [full scale engineering development] are successful, additional environmental analysis will be prepared prior to proceeding to the final milestone, Milestone III (the decision to produce and deploy). Two additional separate environmental impact statements are planned for use in deciding on selection of site(s) and for the Milestone III decision. An affirmative decision at Milestone III could include:
> -Manufacture and assembly of sufficient missiles and space components for an operational force of about 200 to 250 MX missiles
> -Construction of support facilities and equipment for missile deployment at the site
> -An initial operational capability in the mid-1980s (i.e., 10 operational missiles)
> -Operation and maintenance of the MX system into the 21st century
> -Spending an additional $15 to $25 billion for the MX system acquisition, operation and support over its planned life cycle.

Complaint, NR. 1., ¶ 31, App. pp. 29-30. Emphasis added. The four EISs which the Air Force promised to prepare are described in the Air Force's Program Overview, excerpts attached as plaintiffs' exhibit 6 to Daley deposition, NR. 19.) In the following year the government further assured the public:

> The Air Force considers this EIS sufficient to help make decisions on FSED work, and that, the EIS's which will precede site selection and production - development decision, will be likewise sufficient to meet the letter and spirit of NEPA.

(Id., ¶ 34, App. p. 30; also see ¶ 101, App. pp. 65-66. Emphasis added.) This was never done.

The first part of that proposal (the first 27 of 200 MXs) has begun to be acted upon. The proposals for the remaining missiles remain to be debated and acted upon over the coming years. (See discussion, ¶ II(B)(2), infra.)

e. The Proposal to Proceed with the MX

Although the government's proposal to produce and deploy the MX missile has ripened into a firm "proposal" for NEPA purposes [10] and although the government made the promises referred to above, it has not prepared an environmental impact statement. While the government's earlier proposals for legislation included requests for authorization for research and

[10] It is clear the the MX "proposal" exists within the meaning of NEPA, §102(2)(C); see 40 C.F.R. 1502.5, 1508.23. This proposal was developed in the Air Force (Politi deposition, pp. 37-38, NR. 19, see Complaint, NR. 1, ¶ 55, App. pp. 35-36; see footnote 4, supra. The proper scope of an EIS is a matter initially committed to agency discretion. Kleppe v. Sierra Club, 427 U.S. 390, 412 (1976); National Wildlife Fed. v. Appalachian Regional Commission, 677 F.2d 883, 888 (D.C. Cir. 1981); see Baltimore Gas & Electric Co. v. NRDC, U.S. 51 U.S.L.W. 4679, 4681 (1983). While the proposal to procure, produce and deploy the MX requires an EIS, and the Air Force promised the public it would be the subject of an EIS, we acknowledge some latitude to the government as to the precise form of preparation. What we do most respectfully urge forcefully, however, is that whatever the form of the eventual EIS, it must consider the critical environmental impacts discussed in this brief.

development on the MX, its request for authorization for MX for fiscal year 1983 constitutes the first time authorization was sought for procurement, production and deployment of the MX.[11] (See Complaint, NR. 1, ¶¶ 27, 32, 39, 41, 42, 44, 45, 46, 51, 53, 54, 55 and 62, App. pp. 27-37.) Thus, the government in 1982 went beyond the preliminaries and decided to procure, produce, and deploy the MX missile, a major Federal action significantly affecting the quality of the human environment. (Id., ¶ 55. App. pp. 35-36.)

f. The Environmental Effects of the MX in Case of Accident or Use

The potential effects on the "human environment" (NEPA §102(2)(C)) of the MX if used (and the counterforce designed to overwhelm it) include:

(a) immediate death or serious injury to as many as one billion persons (this conclusion was reached based on the modest hypothesis that only one quarter of the nuclear arsenals of the U.S. and the Soviet Union were involved in such an attack) (Complaint, NR. 1, ¶ 130, App. pp. 63-65);

(b) blast effects causing massive loss of trees and soil as well as physical destruction of human-built edifices (Id.);

(c) tremendous fires destroying neighboring cropland, forests, oil and natural gas resources, as well as urban and industrial centers (Id.);

(d) the effects of short term and long term radiation exposure including skin lesions, cancer especially leukemia), sterilization, birth defects through resultant chromosomal aberrations; breakdown of the human defense mechanisms resulting in rampant disease, like the bubonic plague, exacerbated by an extreme shortage of medicine and hospitals (Id.);

(e) destruction of the natural food chain from zooplankton and phytoplankton to cows and pigs (Id.); and

(f) changes in the earth's climatic conditions and all the effects on the human environment they may produce. (Id.).[12]

[11] The critical distinction between authorization requests (which can require environmental impact statements) and appropriations requests (which do not) is well summarized in the leading Supreme Court case on the subject, Andrus v. Sierra Club, 442 U.S. 347, 359 n.18 (1979).

[12] The record contains considerable evidence of scientific studies that have been performed on the subject of the environmental effects of nuclear explosions and nuclear war; on the conclusions of those studies; and on the practicality and utility of making that information available to the decisionmakers and to the public. See the declarations of Herbert Scoville, Jr., NR. 17, and of James J. MacKenzie, NR. 30, and the attachments to the latter. (App. pp. 117-179.)

Dr. Scoville is a former Assistant Director for Scientific Intelligence and Deputy Director for Research of the Central Intelligence Agency, former Assistant Director for Science and Technology of the U.S. Arms Control and Disarmament Agency, former Technical Director of the Armed Forces Special Weapons Program at the Department of Defense, and former Senior Scientist on the Los Alamos Contract for the Atomic Energy Commission. As Technical Director of the Armed Forces Special Weapons Project he was responsible for overall technical management of Department of Defense studies on the effects of nuclear explosions. (App. p. 117.)

Some of the effects are cumulative or synergistic. Id.[13] Geographically, some would be regional or confined to an area relatively close to where the nuclear explosion occurred. Id. Others would be worldwide, affecting the global commons and the biosphere as well as having effects within the United States. Id.

It is important to realize that reputable scientific research and opinion distinguishes between the potential environmental impacts of different sorts of nuclear attacks. [13] See: U.S. Office of Technology Assessment (OTA), Effects of Nuclear War, excerpts attached as Appendix A to MacKenzie Declaration, NR. 30 App. pp. 126-157; Scoville and MacKenzie Declarations, NR. 17,30, generally (App. pp. 117-179). The record in this case is instructive. In the words of the scientist who was responsible for the Defense Department studies on the effects of nuclear explosives:

> Reputable scientific work has been done which relates general scientific research on the subject to specific weapons systems and to specific deployment plans. It is therefore possible with a reasonable degree of scientific accuracy to make projections

Footnote 12 continued

Dr. MacKenzie, a nuclear physicist, was the former Senior Staff Member for Energy at the Council on Environmental Quality in the Executive Office of Presidents Carter and Reagan, where he was in overall charge of the Council's work in the nuclear area. He is now a Senior Staff Scientist with the Union of Concerned Scientists, concerned with the impact of advanced technology on society, specifically including nuclear arms control. (App. pp. 121-122.

13 This is not to assert a view that a nuclear war would in fact be kept limited, but only to point out that disparate impacts are projected for different situations.

> as to the impacts on the environment (including human populations) associated with specific weapons systems and particular basing modes in the event of a nuclear exchange.

Scoville Declaration, NR. 17, App. p. 118; see MacKenzie Declaration, NR. 30, App. p. 123. After describing the effects on the human environment that may be projected, Scoville continues:

> The environmental impacts of this sort can be analyzed in a region-specific or site-specific manner, such as with respect to the Dense Pack or Closely Spaced Basing mode in the vicinity of F.E. Warren Air Force Base, Wyoming. Such analysis can also be done for a comparison of different basing modes or different strategic systems, comparing for example the exchange scenarios associated with deployment of a new weapons system on land or sea, or in different configurations on land.

Scoville Declaration, NR. 17, App. p. 120.

Another scientist, who formerly was in charge of the nuclear area of the Council on Environmental Quality (the agency responsible for implementation of NEPA) in the Executive Office of Presidents Carter and Reagan, gives an example:

> These studies [by the National Academy of Sciences, OTA, and others] provide data upon which it is possible to make projections about the impact on the environment and upon people of certain types of nuclear exchanges. For instance, the Office of Technology Assessment examines such impacts in a variety of situations and locations. . . . The OTA study takes Detroit as an example and shows the impact of nuclear bursts in a variety of situations. . . . The maps with circles at given distances . . . show the impacts that can be expected at given distances from the targets under the cases assumed. Similarly, OTA has made projections for a "counterforce" attack against the United States. . . . This

> includes studies of the impact of nuclear explosions at the various locations of U.S. strategic weapons. The OTA study relied upon Executive Branch calculations for estimates of fatalities under several different attack cases. . . . For instance, a Soviet attack on U.S. ICBMs is projected to cause fatalities between 1-3 percent (low range) and 8-13 percent (high range) of the U.S. population, while a Soviet attack on counterforce targets, other military targets, economic targets, and population is projected to cause fatalities of up to 60-88 percent of the U.S. population.

MacKenzie Declaration, NR. 30, App. pp. 122-123.

The effects on the human environment of different basing modes may vary considerably. Scoville and MacKenzie Declarations, App. pp. 117-179. For instance, a given basing mode would be so configured as to compel an adversary to develop "counterforce" preemptive or retaliatory strategies designed to overcome that mode, which would have particularly severe effects. Complaint, ¶ 97, App. pp. 62-63. By way of another example, plaintiffs asked for a comparison in the MX EIS of the "sea based" alternative to the land based alternatives. Id., ¶98, App. p. 63. Clearly an accident or a nuclear explosion at sea will have very different effects from one where people live on land.[14] MacKenzie Declaration, NR. 30, App. p. 123. Some

14 We note, parenthetically and sadly, that the Air Force EISs on its MX do not consider alternatives under the jurisdiction of the Navy (although required to do so). The Defense Department has yet to assume overall jurisdiction over the NEPA process for these defense alternatives, but instead abdicates such jurisdiction to the individual services, with results which may be anticipated. See footnotes 36 and 42 infra.

of the plaintiffs in this lawsuit live in the area of southeastern Wyoming (and adjacent portions of Colorado and Nebraska) designated by the Air Force as the "Region of Influence" (ROI). Complaint, ¶ 95, App. p. 61.) (While that designation applied to the Dense Pack basing mode, the present MX in Minuteman silo mode is proposed for the same region. Alternatives which are geographically remote from their homes have very real meanings to the affected people who are in the "ROI." See Id., ¶¶ 98, 102, 106, 107, App. pp. 63, 66, 68, 69.

Another alternative that should be considered in a properly prepared *EIS* on the MX system is that of "no action," which might include concepts ranging from relying on existing weapons ("no action" to depart from the status quo) to arms control ("no action" in a larger sense). (See Id., ¶ 98, App. p. 63.)

Why is this useful? In the words of the former CEQ scientist, "Clearly, people in a targeted location may be expected to be interested in the effects on them of projected nuclear attacks." MacKenzie Declaration, NR. 30, App. p. 123.

> Based upon my familiarity with the studies of the environmental effects of a nuclear exchange and with the operation of the National Environmental Policy Act, I believe it is possible to incorporate the information on the effects of nuclear weapons into an environmental impact statement in a manner that is useful both to decisionmakers (Executive and Legislative) and to the public. It is specifically possible to do this with respect to the projections for a nuclear exchange with a *particular basing mode in a particular* region or site. As was done in (specified studies), it is possible to create maps for an affected location showing projected fatalities and other impacts. Furthermore, this sort of analysis for a given area (such

> as a geographical area of specific dimensions' may be done in part with graphic and map presentations in rough but useful form in a matter of days or weeks. In my judgment there is no reason why the responsible government agencies cannot incorporate these impacts into an environmental impact statement supplement within a matter of weeks. If not perfect information, it would still be useful information particularly to those affected of the sort it is the purpose of NEPA to make public and to require to be made a public part of the decisionmaking process.

Id., App. pp. 124-125.

SUMMARY OF ARGUMENT

The Court below erred in construing the National Environmental Policy Act and an exemption to that Act which on its face is confined to exempting a particular "report" from NEPA so as to exempt the whole proposal to procure, produce, and deploy the MX missile from NEPA. Agencies must comply with NEPA "to the fullest extent possible." Exemptions to NEPA are extraordinarily narrowly construed. The "only time" such exemptions are permitted is in the case of a "clear and unavoidable conflict" with statutory authority. There certainly is none here. This Court has made clear there is no "national security" exemption from NEPA. Here the narrowly-drawn, explicit exemption clearly does not relieve the government of its NEPA responsibilities with respect to the MX proposal. An implied exemption is still more difficult to reconcile with the rules for NEPA exemptions. Plaintiffs respectfully submit that Congress meant exactly what it said in both NEPA and the

exemption to it. The government must examine the potential environmental impacts of its actions, including the low probability/high severity impacts of accident or use.

Appellants seek in this brief to place the decision of the court below in context. The effect of that court's ruling is to exempt the MX missile proposal from NEPA. It is that context which we respectfully emphasize. Whatever the Court below said about repeals by implication and resulting mootness, the fact is that that Court has construed the Jackson Amendment so as to exempt a Federal proposal of enormous magnitude from the reach of NEPA.

There exists a well-defined body of case law on NEPA exemptions. The Courts have held the policies underlying NEPA to be so compelling that the normal canons of meshing two statutes of equal dignity do not apply. NEPA prevails, absent a "clear" and "unavoidable" conflict. It is for this reason that we have structured our argument to emphasize the proper construction of NEPA and how exemptions, whatever they may be called, are to be narrowly construed.

The National Environmental Policy Act requires an environmental impact statement on "every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment". (NEPA, §102(2)(C); emphasis added, App. p. 99.) For actions covered by NEPA the binding regulations of the Council on Environmental Quality require analysis of low probability high severity environmental impacts,

such as by a "worst case" analysis. 40 C.F.R. 1500.22.[15] Surely these vital requirements should not be avoided by an implied exemption for a proposal of such magnitude as the MX weapons system.

ARGUMENT

I. THE MILITARY IS NOT EXEMPT FROM NEPA.

A. NEPA Exemptions Are Narrowly Construed, and The Government Must Comply with NEPA "to the Fullest Extent Possible".

In Flint Ridge Development Co. v. Scenic Rivers Ass'n, 426 U.S. 776, 787, 788 (1976), the Supreme Court expressly stated:

> NEPA's instruction that all federal agencies comply with the impact statement requirement - and with all the other requirements of §102 - 'to the fullest extent possible,' 42 U.S.C. §4332, is neither accidental nor hyperbolic. Rather, the phrase is a deliberate command that the duty NEPA imposes upon the agencies to consider environmental factors not be shunted aside in the bureaucratic shuffle. This conclusion emerges clearly from the statement of the Senate and House conferees, who wrote the 'fullest extent possible' language into NEPA:
>
> > 'The purpose of the new language is to make it clear that each agency of the Federal Government shall comply with the directives set out in [102(2)] unless the existing law applicable to such agency's operations expressly prohibits or makes full compliance with one of the directives impossible . . . Thus, it is the intent of the conferees that the provision 'to the fullest extent possible' shall not be used by any Federal agency as a means of avoiding compliance with the directives set out in section 102. Rather, the language in section 102 is intended to assure that all agencies of the Federal Government shall comply with the directive set out in said section 'to the fullest extent possible' under their statutory authorizations and that no agency shall utilize an excessively narrow construction of its existing statutory authorizations to avoid compliance.' 115 Cong. Rec. 39703 (1969) (House conferees) (emphasis added).

B. The "Only Time" NEPA Obligations Can Be Avoided Is For a "Clear and Unavoidable" Conflict In Statutory Authority

Likewise, in the leading case dealing with NEPA and national security, this Court asserted that the "only time" a federal agency can avoid NEPA's obligations is "when a clear and unavoidable conflict in statutory authority exists." Concerned About Trident v. Rumsfeld, 555 F.2d 817, 823 (D.C. Cir. 1977) citing Flint Ridge Dev. Co. v. Scenic Rivers Ass'n., supra, 426 U.S. 776 (1976).

C. There Is No "National Security" Exemption From NEPA

This Court has already made clear that the rubric of "national security" provides no exemption from the reach of the National Environmental Policy Act. Concerned About Trident v.

[15] The CEQ NEPA Regulations (40 C.F.R. Parts 1500-1508) have been characterized by the Supreme Court as "mandatory regulations applicable to all federal agencies." Andrus v. Sierra Club, 442 U.S. 347, 358 (1979); see Sierra Club v. Sigler, supra, 695 F.2d 957, 964 (5th Cir. 1983). The implementing CEQ NEPA Regulations have been set out in ¶¶ 74-85 of the Complaint, NR. 1, App. pp. 42-57. Specifically included are summaries of the regulations concerning: the general provisions relating to NEPA and the implementing regulations and procedures, ¶¶ 74-78 (App. pp. 42-43); the purpose of NEPA and the CEQ NEPA Regulations, ¶ 79 (App. p. 44); a chronological description of NEPA process requirements, ¶¶ 80-81 (App. pp. 44-53); the requirements for an adequate environmental impact statement, ¶¶ 83-85 (App. pp. 53-57). In the interest of brevity we do not repeat this outline here. Certain of the regulations are set out at pp. 105-109 of the Appendix.

Rumsfeld, supra,[16] quoted above, arose out of a secret study of alternative systems of nuclear deterrence. Id., at 820. The Trident system was a new submarine-launched ballistic-missile system, a further development of the previously deployed Polaris Poseidon missile-carrying submarines. Id. In the course of developing the new system, a total of twenty-three environmental impact statements and assessments had been prepared. Id., at 821, n.6. (Of course, the sheer number of studies failed to save the Navy from this Court's holding that it failed adequately to study the correct things.)

The Court began by disposing rapidly of "several preliminary arguments." In Judge Tamm's clear and controlling words for the Court:

> The Navy raises several preliminary arguments to the effect that its action is completely free from the strictures of NEPA and court review [footnote omitted]. The only one which merits any extended discussion is the rather cursory argument that 'NEPA cannot possibly apply' to strategic military decisions made by the Department of Defense-Navy. [Footnote omitted.] . . . . We view this as a flagrant attempt to exempt from the mandates of NEPA all such military actions under the overused rubric of 'national defense'. This effort to carve out a defense exemption from NEPA flies in the face of the clear language of the statute, Department of Defense and Navy regulations, Council on Environmental Quality ("CEQ") Guidelines, and case law.

Id., at 822-823. (Emphasis added.)

[16] As this Court stated per curiam, the opinions of both Judge Tamm and Judge Leventhal are opinions of the Court. 555 F.2d at 820.

Noting that Section 102 of NEPA "clearly instructs all federal agencies to comply with its requirements" (Id., at 823 emphasis in original),[17] Judge Tamm continued for the Court:

> There is no support in either the statute or the cases for implying a "national defense" exemption from NEPA. See Natural Resources Defense Council, Inc. v. Morton, 148 U.S. App. D.C. 5, 458 F.2d 827, 836 (1972); Committee for Nuclear Responsibility, Inc. v. Seaborg, 149 U.S. App. D.C. 393, 463 F.2d 796, 799 (1971); People of Enewetak v. Laird, 353 F.Supp. 811 (D. Hawaii 1973). The Navy, just like any federal agency, must carry out its NEPA mandate "to the fullest extent possible" and this mandate includes weighing the environmental costs of the Trident Program even though the project has serious national security implications. [Footnote omitted.]

Id., at 823.

Judge Tamm noted that there (as here, we might add) the lawsuit did "not attack the Navy's Trident decision on the merits." Id. (Emphasis the Court's. The attack there, as

[17] The present CEQ NEPA Regulations, which replaced the CEQ Guidelines in effect at the time of Trident, repeat the provision quoted in that case almost verbatim:

> "The phrase 'to the fullest possible' in section 102 means that each agency of the Federal Government shall comply with that section unless existing law applicable to the agency's operations expressly prohibits or makes compliance impossible."

40 C.F.R. 1500.6. See para. I A(1), supra.

here, was on "the inadequacies in the decisionmaking process" which gave rise to the decision. Id., at 824.[18]

Judge Leventhal, also writing for the Court (Id., at 820), noted that the recommendation to use a "dedicated site" was made in 1968 (before the effective date of NEPA, which was January 1, 1970). Id., at 831. NEPA then "became effective in medias res," presenting the question whether to overhaul a strategic decision because of environmental factors. Id. In a further holding of direct and pertinent relevance to what appears to be the Air Force's method of operating with respect to the MX, Judge Leventhal continued for the Court:

> The Navy's solution was to defer the environmental assessment to the future, to the time when the particular site would be selected. That approach is not sound, since it fails to deal with the possibility that environmental considerations that were

[18] The Court also noted: "[I]t is obvious here that the Navy has failed to so much as even mention the environmental aspects of alternatives so that the Final EIS is not as informative in this respect as it should be." Id., at 827. The Court went on to say that "those concerned with the consequences of the decision are not given any notice of the relative environmental effects of feasible alternatives." Id. The Navy was therefore directed to expand its Project Alternative section of the Final EIS in order to comply with NEPA. Id.

The Navy had also adopted an arbitrary cut-off date for reviewing future environmental impacts which was only seven years ahead. Id., at 829-830. This, the Court held, was erroneously "short-sighted." Id., at 830. The Navy's short-sightedness had been wrongly upheld by the District Court, said the Court of Appeals. "A forecasting of seven years 'fails to ensure that the environment will be preserved and enhanced for the present generation, much less for our descendants.'" Id.

> not overwhelming enough to affect the result when considered at a later time might have tipped the scales if timely considered.

Id., at 831.

Judge Leventhal noted the "less than adequate" NEPA procedures for a project already in process by the time of NEPA's enactment, balancing that with the strategic interests at stake, and concluding that the Navy's assessment was "insufficient" and "very vexing" but not the kind of "gross violation of NEPA" that "would override even strong strategic considerations." Id.[19] Judge Leventhal then concluded by discussing how the Court's requiring compliance with NEPA was important:

> The Defense Department is obligated to undertake a NEPA analysis in good faith. And this means more than taking the prior statement as incorporating a 'given' result in regard to consequences of construction, with attention narrowly focused on the incremental environmental consequences of operation. It requires a fresh look at the balance -- weighing the overall consequences to the environment (construction plus operation) against the benefits of the project, and weighing the alternatives with the same overall balance.

[19] Given the Navy's lack of arbitrary or capricious action and the Navy's good faith attempt to comply with NEPA, which failed in only two instances, work was permitted to continue on Trident while the Navy was ordered to supplement its final EIS to correct the deficiencies previously described. Id., at 830. Judge Leventhal, writing for the Court, felt that injunctive relief was inappropriate in part because the decision under review was made in 1968, before the effective date of NEPA. Id., at 831.

> It may not be likely that the Defense Department will in the end decide to scrap the Bangor project. But NEPA has been a contributing factor to other governmental decisions to abort projects on which substantial energies and resources had been expended — as in the case of the Trans-Florida canal, or to modify a project even when the central concept is not found to violate the statutory standard -- as in the case of the Alaska Pipeline. [footnote omitted.] So it may be here that a fair look at overall environmental aspects will accompany a rethinking of strategic concepts. It may be, for example, that the Defense Department will conclude that the Bangor project should go forward, but not with the same scope or features, [footnote omitted] and that it can be coordinated with other sites and facilities in a better balance of strategic and environmental considerations. In any event, our decision holds this door open.

Id.

As this discussion aptly illustrates, requiring compliance with NEPA, even given a major governmental commitment to the project, still serves the purposes for which the law was enacted.

Concerned About Trident is presently the leading case in the nation on the subject,[20] but many other cases have also applied the environmental laws (including NEPA) to national security actions.

In Weinberger v. Catholic Action of Hawaii, 454 U.S. 139 (1981), for example, the Supreme Court assumed the applicability of NEPA to national security projects. While the narrow and idiosyncratic holding of the case that a

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20 Trident was also followed in Jackson Cty., Mo. v. Jones, 571 F.2d 1304, 1307 (8th Cir. 1978).

"hypothetical" environmental impact statement need not be prepared on a hypothetical proposal, the existence of which is itself a secret, is clearly inapplicable here.[21] It must be noted that the Court quite properly and with unanimity assumed that NEPA applied to national security projects. The Navy was

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21 In Catholic Action, supra, the Court was presented with a unique situation where the very fact of whether nuclear weapons were being stored in a given place was a secret. The Court of Appeals tried to apply NEPA by inventing a "Hypothetical Environmental Impact Statement." Id., at 145. The Supreme Court simply said the invention had no warrant in law. Id., at 144-146. The case has no relevance to the situation before this Court, where the proposals are hardly secret and where the government freely acknowledges its NEPA obligations by partly complying with them. The Catholic Action situation is also quite different from the more common one where the existence of the project is not secret, but some or all of the NEPA documents may be kept secret. 40 C.F.R. 1507.3(c); see Committee for Nuclear Responsibility, Inc. v. Seaborg, 463 F.2d 783, 792-793 (D.C. Cir. 1971), see 404 U.S. 917 (1971).

McQueary v. Laird, 449 F.2d 608 (10th Cir. 1971), was a case brought under the Fifth and Ninth Amendments and the Military Ammunition Storage Act to enjoin the United States from storing chemical and biological warfare agents in the Rocky Mountain Arsenal. Id., at 609-610. The Court considered these claims in detail and rejected them. Only after the substantive discussion and on the last page of the opinion, did the Court note: "During oral argument the appellants for the first time indicated that jurisdiction may vest by virtue of the National Environmental Policy Act . . . ." Id., at 612. It is unclear what Plaintiffs sought to establish, except jurisdiction, by mentioning NEPA, but environmental impact statements are not referred to in the opinion. Id. This last minute lunge at a new jurisdictional basis failed to move the Court. The NEPA holding of this case, which is a bit unclear, has never been followed out of the 10th Circuit.

still bound to "consider the environmental consequences in its decisionmaking process . . . ." (Id. at 146.)[22]

In Weinberger v. Romero-Barcelo, 456 U.S. 305, 1982), Plaintiffs challenged the Navy's use of Vieques Island, off Puerto Rico, for target practice under a variety of statutes.

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22 The decision of the Court of Appeals in Catholic Action, while reversed on the secret, hypothetical proposal issue, retains its persuasiveness on the issue of the environmental factors that must be considered under NEPA. The plaintiffs had alleged that nuclear weapons were to be stored near airports and populated areas. They sought to ensure that the EIS studied:

> (1) The risk of nuclear accidents; (2) The enhancement of that risk by the physical proximity of the airports; (3) The effects of any nuclear accident upon the surrounding population and environment of Hawaii; and (4) The effects of continual low-level radiation from the storage of the weapons near populated areas.

Catholic Action of Hawaii v. Brown, 643 F.2d 569, 571 (9th Cir. 1980), rev'd on other grounds, 454 U.S. 139 (1981).

The Court of Appeals agreed:

> [T]he public must receive some assurance, particularly in a situation as potentially catastrophic as this one, that when the decision is made the decision maker will have been adequately informed as to the environmental consequences of each alternative, here including the potential consequences of the storage of nuclear weapons at this particular site. Consideration of the four environmental factors specified by appellants as being critically important is essential . . . .

The District Court had found, inter alia, that the Navy violated NEPA by failing to file an environmental impact statement. 478 F.Supp. 646, 705 (D.P.R. 1979); see 456 U.S. at 308, n.2. In the interim the Navy filed its EIS (coming into conformity with NEPA), leaving the Navy's noncompliance with a remaining statute, the Federal Water Pollution Control Act (FWPCA), as the only statutory violation for Supreme Court review. Id., at 308, n.2. The Supreme Court noted that the Navy fired "munitions" into the waters around the Island and that "munitions" were included within the statutory definition of "pollutant" under the FWCPA. The Court found that the Navy had, in violation of

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footnote 22 continued

Id., at 571. Emphasis added.

The Ninth Circuit also stated:

> The public also is informed as to the consequences of public action being sought by governmental agencies. While courts are reluctant to second-guess an informed decision maker as to what is or is not in the public interest, an informed electorate need not be reluctant. For this reason, it seems to us to be important that the public be informed where . . . . disclosure can be so conditioned as not to impinge upon national security. . . .

Id. at 571.

law, failed to secure a permit for its pollution of the water. Id., at 308.[23]

Similar national security cases include Aluli v. Brown, 437 F.Supp. 602 (D. Hi. 1977), rev'd on other grounds, 602 F.2d 876 (9th Cir. 1979) (NEPA compliance ordered for practice bombardment by the Navy of an island in Hawaii); People of Enewetok v. Laird, 353 F.Supp. 811 (D. Hi. 1973) (simulated nuclear explosion by the Defense Department enjoined for want of NEPA compliance); [24] Environmental Action Foundation v. Brown, 7 Envt'l L. Reptr. 20372 (D.D.C. 1977) (NEPA and the procurement

[23] The Supreme Court, in dicta, has dealt with the application of NEPA in another national security situation. In TVA v. Hill, 437 U.S. 182 (1978), Chief Justice Burger, writing for the Court, noted an example of an activity clearly barred as a violation of the Endangered Species Act. After quoting a Congressman's discussion of an endangered species, the whooping crane, being threatened by Air Force bombing activities along the Gulf Coast of Texas (Id., at 183), the Chief Justice concluded that the discussion "obviously pinpoints a particular activity --intimately related to the national defense -- which a major federal department would be obliged to alter" in deference to the Endangered Species Act (Id., at 186-187).

[24] Among the cases dealing with NEPA and nuclear technologies (not military applications) is Scientists' Inst. for Pub. Info., Inc. v. Atomic Energy Comm., 481 F.2d 1079 (D.C. Cir. 1973), where this Court held:

> We thus tread firm ground in holding that NEPA requires impact statements for major federal research programs, such as the Commission's LMFBR (liquid metal fast breeder reactor) program, aimed at development of new technologies which, when applied, will significantly affect the quality of the human environment.

Id., at 1091.

and deployment of the B-1 bomber, [25] where the court observed that it "cannot read plaintiffs' complaint . . . as seeking review of tactical military policy; rather they seek review of the environmental impact of the proposed B-1 bomber fleet." [26] (Id., at 20374).

In sum, it is clear that the rubric of national security provides no grounds for a judicially created NEPA exemption.

II. THE JACKSON AMENDMENT MUST BE NARROWLY CONSTRUED SO THAT IT DOES NOT ENTIRELY EXEMPT THE MX MISSILE SYSTEM FROM NEPA

A. The Trial Court Erred In Accepting The Government's Argument Construing the Jackson Amendment to Exempt Its Past and Present NEPA Violations

The District Court accepted the government's argument concerning the construction of the Jackson Amendment, swelling a minor NEPA exemption into a retroactive validation of NEPA violations for the most massive "major Federal action significantly affecting the quality of human environment" (NEPA,

[25] This case proceeded through preliminary motions, but not to final judgment on the merits. All parties agreed in 1977 that the case became moot upon President Carter's scrapping of the B-1 bomber proposal.

[26] To similar effect see: Concerned About Trident v. Rumsfeld, supra, 555 F.2d 817, 823-824 (D.C. Cir. 1977) ("It is important to note that the appellants here do not attack the Navy's Trident decision on the merits. . . . The appellants focus their attack instead on the inadequacies in the decisionmaking process. . . ."); Izaak Walton League v. Schlesinger, 337 F.Supp 287, 291 (D.D.C. 1971) ("Plaintiffs are not requesting review of the granting or denying of a license. They request this Court to direct the AEC to comply with a specific statutory mandate." Also see Id., at 294.").

§102(2)(C) proposed for the country - the MX missile system. This was clear error.

1. The Language of the Jackson Amendment's NEPA Exemption is Exceptionally Clear

The Jackson Amendment to the continuing appropriations resolution (P.L. 97-377, 96 Stat. 1830 (1982)) required a "report" by the President to the Congress on missile systems and basing modes (App. pp. 101-104). That section contained a tightly drawn and exceptionally clear NEPA exemption. In its totality it reads:

> The report required under this subsection shall not be subject to the requirements of section 102(2)(C) of the National Environmental Policy Act of 1969, relating to environmental impact statements.

(P.L., App. p. 103; emphasis added.)

Plaintiffs have no quarrel with this provision. They have never contended that the provision cannot or does not do what it seeks to do - exempt the President's report from §102(2)(C) of NEPA. Plaintiffs' quarrel is with the District Court's acceptance of the government's misconstruction of this simple provision and of the implications drawn from the amendment of which it was a part so as to immunize the MX missile system from any scrutiny - past or present - which NEPA required and requires.

As we have noted above, exemptions from NEPA require "clear and unavoidable conflicts." (See para. I(B), supra. Such a "clear and unavoidable conflict" does not exist here. Quite to

the contrary, it is hard to imagine how a NEPA exemption for a "report" by the President can be magnified into a massive NEPA exemption for all past and present NEPA violations with respect to the MX. [27]

Plaintiffs respectfully submit that it is not necessary to go beyond the wording of the NEPA exemption to explain its meaning. That wording is exceptionally clear. It says that "the report . . . shall not be subject" to the environmental impact statement requirement. (Jackson Amendment, §(C), App. p. 103.) It means what it says. The President's report is not subject to the EIS requirement. No more, quite frankly, need be said about the amendment. It speaks for itself. It does not

[27] Indeed, the most analogous situation was that addressed by this Court in the case applying NEPA to a nuclear test in the Aleutian Islands:

> [T]he recent action of Congress [footnote omitted] requiring the President personally to approve the test before it can go forward does not negate the AEC's obligation to comply with NEPA. Approval by the President and compliance with NEPA are two separate statutory requirements which must be satisfied if the test is to be lawfully carried out. The President's decision satisfies one requirement. This Court, as to the second requirement of law, is left with the responsibility to determine whether the AEC disregarded the will of Congress in preparing the environmental impact statement required by NEPA.

Committee for Nuclear Responsibility, Inc. v. Seaborg, 463 F.2d 783, 791 (D.C. Cir. 1971); inj. den. 404 U.S. 917 (1971).

require extensive aids to interpretation, recourse to the legislative history, or analysis by implication. 28/

Appellants respectfully submit that it is not necessary to pursue the analysis of the meaning of the NEPA exemption beyond its face. As this Court stated in what remains the leading NEPA case (quoting the Supreme Court), "Having concluded that the provisions . . . are clear and unequivocal on their face, we find no need to resort to the legislative history of the Act." Calvert Cliffs Coord. Com. v. United Stated Atomic Energy Comm., 449 F.2d 409, 1127 (D.C. Cir. 1971), cert. denied, 404

28 Congress is quite able to express itself clearly in enacting NEPA exemptions. In the most noted of those statutory exemptions, that pertaining to the Trans-Alaskan Pipeline, Congress provided:

> The actions taken pursuant to this chapter . . . shall be taken without further action under the National Environmental Policy Act of 1969; and the actions of the Federal officers . . . shall not be subject to judicial review under any law . . . .

43 U.S.C. 1652 d) Empnasis added.

This Court characterized that language as follows:

> We recognize that the arguments in favor of repeal by implication will ordinarily be stronger when Congress has passed substantive legislation authorizing a specific project than when it has enacted an appropriations bill. We note, however, that NEPA itself states that all government action must be taken in accordance with the goals set forth in the Act. 42 U.S.C. §4332 (1976). Moreover, Congress has shown that it is fully capable of expressing its desire to exempt projects from NEPA. For example,

U.S. 942 (1972), and cases there cited.

To hunt for guidance from a "legislative history" in this case is to reverse the process employed by the Supreme Court:

> In determining the scope of a statute, we look first to its language. If the statutory language is unambiguous, in the absence of a clearly expressed legislative intent to the contrary, that language must ordinarily be regarded as conclusive.

United States v. Turkette, 452 U.S. 576, 580 (1981) 29 Here the statute is clear, but the "legislative history" is not.

(footnote 28 continued)

> the Trans-Alaska Pipeline Act, Public Law 93-153, provides that "actions . . . shall be taken without further action under the National Environmental Policy Act . . . ." Given Congress's clearly expressed desire to ensure that all government actions are taken in accordance with NEPA, and its ability to expressly override the requirements of the Act, we believe that, even when substantive legislation is involved, repeal by implication should be found only in the rarest of circumstances. Absent very strong evidence in the legislative history demonstrating a congressional desire to repeal NEPA, or a direct contradiction between the Act and the new legislation, claims under NEPA should be reviewed. [Citations omitted.]

Izaak Walton League of America v. Marsh, 655 F.2d 346, 367-368 (D.C. Cir. 1981). (Empnasis added. Also see Alyeska Pipeline Service Co. v. Wilderness Society, 421 U.S. 240, 244-245 (1975); Environmental Defense Fund v. Higginson, 655 F.2d 1244, 1246 (D.C. Cir. 1981); Navajo Tribe of Indians v. Andrus, 644 F.2d 790, 791 (9th Cir. 1981).

29 When an issue is purely a matter of statutory construction, the Court of Appeals' standard of review of the district court's interpretation of the law is de novo. Southeast Alaska Conservation Council v. Watson, 697 F.2d 1305, 1309 (9th Cir. 1983).

Should this Court, however, wish to look beyond the plain language of the statute, we submit the following.

2. If One Looks Beyond the Language of the Jackson Amendment, the Legislative History is Slender, But Supports a Narrow Construction of the NEPA Exemptions

We discuss separately the legislative history 1) of the Jackson amendment, which supports plaintiffs' case and 2) of the NEPA exemption, which is skimpy, ambiguous, and unilluminating.

We start with the legislative history of the Jackson Amendment. The NEPA exemption must be seen as part of the Jackson Amendment as a whole - an amendment whose purpose was to expedite procedures for the selection of a basing mode for the MX missile. 30 The purpose of the Jackson Amendment was to expedite the Presidential report and subsequent Congressional consideration of it. Timetables were included. Provision was made so that the report could not be filibustered or otherwise delayed in Congress. The NEPA exemption was clearly meant to insure that neither NEPA compliance nor a NEPA lawsuit delayed the President's report.

31 A statute should be read in light of its underlying purpose, and sections of it should not be read in isolation from the whole act. Richards v. United States, 369 U.S. 1, 11, (1962); Southeast Alaska Conservation Council v. Watson, supra, 697 F.2d 1305, 1309 (9th Cir. 1983).

The sponsor of the amendment, Senator Jackson, described his amendment as:

> action to expedite the decisionmaking process by the President and by both Houses through affirmative approval of expenditure of the basing and the missile production funds in this particular item of the bill.

128 Cong. Rec. S15022 (daily ed., Dec. 16, 1982). Senator Jackson continued to describe his amendment:

> The amendment now being offered would insure that the Senate and the House would have at a reasonable point in the next session an opportunity to pass the issue of MX without the matter being dragged on and on and the committee resolutions unreasonably delayed and possibly filibustered.

Id.; see also Id., at 15023, 15048. The remarks of other principals involved in the debate are to similar effect. Senator Tower described the amendment as "providing for an expedited procedure [showing] that we intend to make a decision on the matter." Id., at 15024. Senator Stevens said of the Jackson amendment that "basically what it adds is a fast track concept of getting us to a decision on that issue early enough next year so we can make intelligent decisions . . . ." Id., at 15025. The Jackson Amendment, he continued, "triggers a timeframe for review by the Congress and mandates that we must make a decision and that we make a decision early enough" for consideration for 1984 appropriations (i.e., in 1983). Id. Senator Nunn spoke of dealing with the problem "in an expedited fashion" (Id., at 15032), while Senator Quayle called for approval of the "exped : procedures" of the amendment Id., at 15055).

Senate critics of the MX similarly described the effect of the Jackson Amendment. Senator Hollings called it a "big charade of speeding up the President" (Id., at 15027), while Senator Hatfield criticized "circumscribing the parliamentary procedure of the Senate by these expedited procedures" (Id., at 15032).

In brief, the NEPA exemption included in the Jackson amendment must be seen for what it is - part of an expediting procedure intended to see that the President's report and the Congressional vote were not delayed. Nothing in the amendment supports the government's view, accepted by the court below, that some sort of massive retroactive and prospective NEPA exemption was intended.

The "legislative history" of the NEPA exemption, by way of contrast to the clear purpose of the Jackson amendment, is one of those situations, described by this Court in Calvert Cliffs, where the "rather meager legislative history . . . cannot radically transform the purport of the plain words" of the statute. Calvert Cliffs Coord. Com. v. United States A.E.C., supra, at 1126.

Perhaps, indeed, it would be more accurate to say that here there is no legislative history of the NEPA exemption. What the government and the trial court turned to were some contradictory remarks made by three senators, who did not include the sponsor of the "Jackson Amendment" and its included NEPA exemption, which came after passage of the "Jackson Amendment," and which related to another, quite different amendment proposed by

Senator Hart. The words uttered, to say the least, are unilluminating. This ex post facto "legislative history" is as vague as the wording of the statute is clear.

The entire pertinent "history" of the NEPA exemption is six column inches in the Congressional Record. 31/ Several

31 128 Cong. Rec. S15166 (daily ed., Dec. 16, 1982):

EIS ENVIRONMENTAL IMPACT STATEMENT
MR. HART. If I may just have one additional moment, concern has been expressed about the last paragraph of the so-called Jackson Amendment of modification having to do with the environmental protection process, so-called EIS environmental impact statement in the Jackson Amendment.
I just wonder, may I ask the distinguished chairman of the Armed Services Committee, whether in his judgment that language we adopted last night in any way restricts or limits the effects of the so-called NEPA process of the environmental study process on actual deployment?
MR. TOWER. In the view of the Senator from Texas it does not, and once a site is selected the provisions of NEPA would be fully complied with.
MR. HART. Given that understanding in a common interpretation of that language, and given the fact that the Senate seems to be in agreement that is its interpretation, I will not seek to clarify it further.
MR. STEVENS. I would say that the intent, as I understand it, was to make certain that the President's recommendation to Congress is not under the NEPA requirement, but we did not attempt to remove anything else but for that language.
MR HART. Well, that is my understanding and in the process of looking at alternative basing modes that each of those does not have to comply with it.
MR. STEVENS. That is right.
MR. TOWER. Obviously, any mode recommended to Congress which it authorized would be subject to NEPA.
MR. HART. Unless Congress dictated an exception.
MR. TOWER. Unless Congress made an exception.
MR. HART. Which we are not doing in the amendment.
MR. TOWER. That is correct.

For the drafts of the Hart Amendment, see Id., at S15161 and S15165. The earlier Jackson Amendment was adopted at

points should be made about it:

First, it is, as stated above, a very real "history", since the colloquy takes place after passage of the "Jackson Amendment". (Jackson - 128 Cong. Rec. S15057 (daily ed. Dec. 16, 1982); Hart - 128 Cong. Rec. 15166-7 daily ed. Dec. 16, 1982).) Such statements are not entitled to great weight and may even be ineligible for consideration. United Mine Workers v. Federal Mine, 671 F.2d 615, 622 (D.C. Cir. 1982), appeal pending.

Second, this discussion is on an amendment proposed by Senator Hart.

Third, the sponsor of the "Jackson Amendment" does not take part.

Fourth, the ambiguities of the conversation provide a little something for everyone. Plaintiffs can comfortably quote Senator Stevens. The government can with equal comfort quote Senator Hart. It may also claim some solace from Senator Tower. However, in fairness to impartiality, none of these senators is known as a NEPA expert, and knowledge of what NEPA obliges (absent an amendment) or what the Air Force had been doing is not particularly evident. When the author is not explaining his or her amendment and the legislative body is not thereafter voting in reliance upon the sponsor's assurances, a conversation

(footnote 31 continued)

S15057. (Though both appear on the same "legislative day," Sen. Hart refers in the quotation above to the language "we adopted last night . . . ." (See App. pp. 110-116.))

among three senators must be seen for what it is - a conversation among three senators. The purpose, after all, in looking to the sponsor's assurances in a legislative history rests on the assumption that a majority voted in reliance upon those assurances or that interpretation. Here, neither the sponsor nor the chronology support the government's view.

Fifth, looking at the context as a whole, it is clear that all assume for purposes of the colloquy that NEPA has been complied with in the past. It is the future they are concerned about, as is shown particularly in Senator Hart's concern that there be an EIS for siting as specified in his earlier draft Amendment (128 Cong. Rec. S15161 daily ed. Dec. 16, 1982 Quite simply, in their preoccupation with basing modes and sites, the three Senators are not addressing the larger question of the adequacy of NEPA compliance as to the MX missile itself.

In summary, the purpose of the Jackson Amendment is clear - - to seek a prompt report. This history supports plaintiffs' contention that the NEPA exemption, the legislative history of which is meager, is limited to its stated purpose -- exempting the report from NEPA.

3. If One Looks Beyond the Language of the Jackson Amendment, the Doctrine of Repeal by Implication Does Not Apply Here

Since the statute only exempted the "report" from NEPA and since a "clear and unavoidable conflict" 32 between a the

32 The Court below also discussed several cases under different statutory schemes standing for the proposition that legislatures can effectively moot a controversy notwithstanding its pendency before the courts. (App. pp. 87-90.) We have no

(footnote 32 continued)

quarrel with those cases or with their holdings. They are, however, not helpful in answering the question whether Congress has done so in this case involving a NEPA exemption.

In both Kremens v. Bartley, 431 U.S. 119 (1977) and Diffenderfer v. Central Baptist Church of Miami, Florida, Inc., 404 U.S. 412 (1972), relied on by the Court below, the alleged injury was caused by substantive legislation that was eradicated by repeal or modification of the offending legislation subsequent to the trial court's judgment. Here, by contrast, the injury alleged by plaintiffs has not been removed but continues. Defendants have not prepared an EIS on the proposal to produce and deploy the MX, and appear committed to the notion that use of the MX in conflict is too speculative to be worthy of environmental analysis. Daley deposition, NR. 19, at 60, 69-72.

The District Court's reliance on State of Vermont v. Goldschmidt, 638 F.2d 482 (2d Cir. 1980); Arkansas v. Goldschmidt, 627 F.2d 839 (8th Cir. 1980); and New Mexico v. Goldschmidt, 629 F.2d 665 (10th Cir. 1980) is equally misplaced. Those cases dealt with State challenges to presidential impoundment of Federal-Aid Highway funds and the subsequent allocation of remaining funds by the Secretary of Transportation. The Courts of Appeal held that the controversy was moot, because, in the time intervening between the District Court's orders and "(w)ith a full awareness of these pending controversies between the several states and the Secretary, Congress passed legislation designed to fully resolve all such controversies." New Mexico v. Goldschmidt, supra, 629 F.2d at 667. But there, unlike here, the conference report specifically and unequivocally stated that the legislation was intended to moot all aspects of the pending litigation:

> The conferees are aware that at least nine states have brought suits challenging the President's deferral . . . as well as the method chosen . . . to allocate the remaining fiscal year 1980 obligational authority among the States. The conferees are also aware that in some of these suits, district courts have issued orders declaring the deferral and/or the allocation formula illegal and ordering the Secretary . . . to take certain actions. It is the intent of the conferees that this legislation, in setting a new statutory obligational ceiling for fiscal year 1980 and in providing a statutory distribution formula, act to moot all aspects of the pending litigation, including any effects to hold the Secretary in contempt of court . . . . [Emphasis added.]

Id.

limited NEPA exemption for the "report" and (b) the performance of the government's duties with respect to NEPA and the proposal for the MX cannot be said to exist, the government was forced to argue that NEPA was repealed by implication. That argument contends, based on the "Jackson Amendment," that having required a report on missiles and having required that report to, inter alia, address environmental matters, Congress implicitly repealed NEPA as to missiles generally.

It is, of course, difficult for the government to argue both an explicit NEPA exemption and an implied NEPA exemption in that Congress in delineating the contours of the former left little ground for arguing the latter. Congress said clearly what it was exempting. The fact of its having drawn a carefully crafted exemption militates against an argument that there also exists -- by attenuated implication -- some other, greater exemption.

This Court has had previous occasion to address the situation of implied NEPA exemptions:

> Given Congress' clearly expressed desire to ensure that all government actions are taken in accordance with NEPA, and its ability to expressly override the requirements of the Act, we believe that, even when substantive legislation is involved, repeal by implication should be found only in the rarest of circumstances. Absent very strong evidence in the legislative history

(footnote 32 continued)

In the case at bar, not only is there no clear statement in the legislative history to the effect that the "Jackson Amendment" is to remove outstanding NEPA obligations from judicial review, there is no legislative history at all. See para. II.A)(2), supra.

> demonstrating a congressional desire to repeal NEPA, or a direct contradiction between the Act and the new legislation, claims under NEPA should be reviewed. [Citations omitted.]

Isaac Walton League of America v. Marsh, supra, 655 F.2d 346, 367 (D.C. Cir. 1981); see discussion at 366-368.33

Congress said what it intended to do -- exempt a Presidential report from the requirements of an environmental impact statement. The legislative history adds nothing to the clear language of the statute. Moreover, this limited exemption creates no conflict with NEPA's broader requirements for an EIS on the proposal to go ahead with the MX. We respectfully submit that it is not necessary for the judiciary to add to the exemption Congress enacted.

B. Significant Environmental Effects Remain Usefully To Be Studied In an Environmental Impact Statement on the MX Missile, Which EIS Will Continue to Be Used Now and in the Future

1. The National Environmental Policy Act Requires the Government to Study the Most Significant Environmental Effects of Its Proposal - the Impact in the Event of a "Worst Case" - a Accident or Nuclear Exchange

What Appellees have persistently failed to do, in violation of NEPA and its implementing regulations, is to examine the

33 See Tennessee Valley Authority v. Hill, supra, 437 U.S. 153, 189-190 (1978), where the Supreme Court rejected the argument that Congress had repealed the Endangered Species Act by implication when it appropriated funds for construction of Tellico Dam, knowing that the project would destroy the natural habitat of the snail darter, an endangered species, and despite the view expressed in the committee report that the Endangered Species Act did not apply. Also see Committee for Nuclear Responsibility, Inc. v. Seaborg, supra, 463 F.2d 783, 785 (D.C. Cir. 1971); National Audubon Society v. Andrus, 442 F.Supp. 42, 45-47 (D.D.C. 1977).

environmental effects of the weapons if used as intended and as designed - in a nuclear exchange 34/ or if an accident occurs. Of course, we all devoutly hope that they will never be so used, but we also know that they may be, which is why significant numbers of the public are interested and concerned.

It goes without saying that plaintiffs as parties to litigation do not presume to ask nor would we expect this Court or any Court to substitute its judgment for that of the Executive and Legislative branches.35/ We too are fully aware of the delicate and sensitive issues involving the security of the nation which must be balanced in making decisions and of the constraints appropriate to the judicial role.

However, Congress has explicitly prescribed the processes which the Executive is to follow in decisionmaking - processes designed to involve the public in that decisionmaking and to ensure that all significant environmental consequences are uncovered and aired before decisions are made. NEPA, among other things, has aptly been termed at the very least "an environmental full disclosure law." Environmental Defense Fund v. Tennessee Valley Authority, 468 F.2d 1164, 1180 (6th Cir.

34 Plaintiffs repeatedly requested that the government study these issues in their EISs related to the MX (Admissions 18, 25, NR. 14; Complaint, NR. 1, para. 34, App. p. 30) continuing into 1983 (Second Declaration of Stephen Wheeler, NR. 17).

35 The judicial role has often been stated (using the formulation originated by this Court) as requiring the agency to take a "hard look" at environmental impacts. Kleppe v. Sierra Club, 427 U.S. 390, 411, n.21 (1976); NRDC v. Morton, 458 F.2d 827, 838 (D.C. Cir. 1972). Here, of course, the agency took "no look" at the severest consequences.

1972). It is the legislative direction to "look before you leap" environmentally.[36] This wise and pervasive law has worked. NEPA has gone far to reform executive decisionmaking, to instill an awareness of the environmental consequences of Federal actions before they are undertaken, and to involve the public in that decisionmaking process. See Council on Environmental Quality, "Environmental Impact Statements, An Analysis of Six Years' Experience of Seventy Federal Agencies" (1976). Furthermore, it has been the Courts that have made NEPA the success it is. Courts have been willing to enforce Congressional limitations on the way the Executive goes about its business, so that the Congressional commands, in the words of this Court in its first landmark NEPA case, do not become

[36] The requirement to examine alternatives under NEPA (§102(2)(C)(iii)), which appears in the regulations as the section on "Alternatives Including the Proposed Action," 40 C.F.R. 1502.14, is described as "the heart of the environmental impact statement." Id. The duty to present alternatives has also been described as the "lynch pin" of the EIS. National Resources Defense Council v. Callaway, 524 F.2d 79, 92 (2d Cir. 1975). The EIS is to "present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." 40 C.F.R. 1502.14; see CEQ "Supplementary Information" in 43 Fed. Reg. 55978, 55983-55984 (Nov. 29, 1978). Despite the unification of the services which supposedly occurred with the creation of the Department of Defense in 1947, rigorously separate identities live on in weapons system selection. Here the Defense Department relinquished NEPA's examination of alternatives to the Air Force. (See footnotes 10, supra, and 42 infra.) The Air Force in turn considered only Air Force controlled weapons and basing modes (see pages 10 to 14 of Statement of Facts), not Navy ones such as additional submarine-launched missiles. This is clearly illegal. An agency must consider alternatives not within its jurisdiction. See discussion in footnote 42, infra.

"lost or misdirected in the vast hallways of the Federal bureaucracy." Calvert Cliffs Coordinating Committee v. A.E.C., supra, 449 F.2d 1109, 1111 (D.C. Cir. 1971), cert. denied, 404 U.S. 942 (1972).

Some of the impacts to be discussed under NEPA are direct, immediate, and certain - industrial effluent will contaminate the water; a coal-fired plant's emissions will pollute the air; a mining lease will preclude other uses of the involved public lands; a supersonic bomber will create noise pollution. Other Federal actions requiring environmental impact statements may involve less certain but more severe consequences - the dam or the housing development near the earthquake fault; the nuclear power plant near human settlements; the HUD financed development in the hundred year flood plain; the liquified natural gas tanker designed to ply treacherous straits. All these proposals have in common a lower probability (or otherwise put, a higher improbability) of occurrence coupled with particularly severe consequences should the contingency occur.

a. NEPA Requires Analysis of Low Probability/ High Severity Environmental Impact

This latter type of low probability/high severity environmental impact must clearly also be addressed under NEPA.[37] The Before the effective date of the CEQ NEPA

[37] One of the functions of an EIS is to indicate the extent to which environmental effects are essentially unknown. Scientists Institute for Public Information v. A.E.C., supra, 481 F.2d 1079, 1092 (D.C. Cir. 1973); State of Alaska v. Andrus, 580 F.2d 465, 473 n.36 (D.C. Cir. 1978), another part vacated, 439 U.S. 922 (1978).

Regulations (1979), the leading case in the field was this Court's opinion in Scientists' Institute for Public Information v. Atomic Energy Commission, 481 F.2d 1079 (D.C. Cir. 1973). Since the effective date of the CEQ NEPA regulations, the leading case, which presents the most thorough discussion of issues comparable to those before this Court, may well be Sierra Club v. Sigler, supra, 695 F.2d 957 (5th Cir. 1983). Both cases squarely support plaintiffs in this case.

The Sigler case involved an environmental impact statement on a proposed deepwater port at Galveston, Texas. Id., at 961. The pertinent question was whether a "worst case" analysis discussing the "catastrophic impact" of a total cargo loss by a supertanker in Galveston Bay was required. Id. at 972-973. The Court held it was.

The Court starts with the CEQ NEPA Regulations, which "are binding on all Federal agencies. See Andrus v. Sierra Club, 442 U.S. 347, 356-358, 99 S. Ct. 2334, 2340, 60 L. Ed.2d 943 (1979)." Id., at 964. The Court then quotes the whole of the regulation pertinent to the "worst case" situation, 40 C.F.R. 1502.22 (Id.), which we also quote in full:

> Section 1502.22 Incomplete or unavailable information.
>
> When an agency is evaluating significant adverse effects on the human environment in an environmental impact statement and there are gaps in relevant information or scientific uncertainty, the agency shall always make clear that such information is lacking or that uncertainty exists.
> (a) If the information relevant to adverse impacts is essential to a reasoned choice among alternatives and is not known and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement.
> (b) If (1) the information relevant to adverse impacts is essential to a reasoned choice among alternatives and is not known and the overall costs of obtaining it are exorbitant or (2) the information relevant to adverse impacts is important to the decision and the means to obtain it are not known (e.g., the means for obtaining it are beyond the state of the art) the agency shall weigh the need for the action against the risk and severity of possible adverse impacts were the action to proceed in the face of uncertainty. If the agency proceeds, it shall include a worst case analysis and an indication of the probability or improbability of its occurrance.

40 C.F.R. 1502.22; see Complaint, NR. 1., para. 85(d) App. p. 55). 38/ (Emphasis added.)

The Court of Appeals then turned to the language of NEPA, its legislative history, the case law interpreting NEPA, and the history of the CEQ worst case regulation. Id. at 969-971. The Court quoted this Court's landmark Scientists' Institute for Public Information (SIPI) case, supra:

> [O]ne of the functions of a NEPA statement is to indicate the extent to which environmental effects are essentially unknown. It must be remembered that the

[38] We here stress the "worst case" analysis of 40 C.F.R. 1502.22(b) because the government seems to assert that the environmental impacts of the MX if used in a nuclear exchange are too speculative to be discussed in an EIS (Daley deposition, NR. 19, p. 72; also see Id., Plaintiffs' exhibit 7), which puts the matter squarely under 1502.22(b). (App. p. 108.) If the environmental impact were simply unknown and could be learned, it would be required to be presented in the EIS under 1502.22(a). Of course, known consequences must be discussed. 40 C.F.R. 1502.16.

> basic thrust of an agency's responsibilities under NEPA is to predict the environmental effects of proposed action before the action is taken and those effects fully known. Reasonable forecasting and speculation is thus implicit in NEPA, and we must reject any attempt by agencies to shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as 'crystal ball inquiry.' The statute must be construed in the light of reason if it is not to demand what is, fairly speaking, not meaningfully possible . . . .' But implicit in this rule of reason is the overriding statutory duty of compliance with impact statement procedures to the 'fullest extent possible.'

Sierra Club v. Sigler, supra, at 970.

The Fifth Circuit continued:

> The EIS also must consider the probabilities of the occurrence of any environmental effects it discusses when it evaluates their environmental impact.

Id.

The Court made clear that to require disclosure of the "worst case" is not to prohibit an action from proceeding, but rather to have the facts set forth, along with the estimate of the probability of their occurrence. Id., at 970-972, 973. The Court went on to note that "CEQ's interpretation of its worst case regulation makes it quite clear that the Sierra Club's catastrophic worst case is precisely what the CEQ intended." Id., at 972. The Court quoted CEQ explanatory material, declaring that "all known possible environmental consequences of agency action" are to be covered, including analysis of a "low

probability/catastrophic impact event." Id. (Emphasis in the original.) 39/

b. Issues of "Remoteness" and "Speculation" are False Issues

The Defendant in Sigler, an officer in the Department of the Army's Corps of Engineers, asserted that a worst case analysis was not required for "remote consequences," an argument which the trial court erroneously accepted. Id., at 974. The Court of Appeals, in reversing, stated:

> As to remoteness, the triggering provisions do not use it as a criterion. The remoteness problem is instead addressed by mandating the preparation of a worst case analysis and indicating to the decisionmaker the probability or improbability of its occurence. (Citations omitted.) Thus the fact that the possibility of a total cargo loss by a supertanker is remote does not obviate the requirement of a worst case analysis in the FEIS.

Id., at 974. (Emphasis in the original.)

39 The Supreme Court's recent decision in Metropolitan Edison Co. v. People Against Nuclear Energy ___ U.S. ___, 51 U.S.L.W. 4371 (1983), is fully consistent with plaintiffs' position. That Court declined to apply NEPA to the psychological fears generated by the "risk" of a nuclear accident at Three Mile Island. In so holding the Court distinguished the situation analagous to this case:

> We emphasize that in this case we are considering effects caused by the risk of an accident. The situation where an agency is asked to consider effects that will occur if a risk is realized, for example, if an accident occurs at TMI-1, is an entirely different case. The NRC considered, in the original EIS and in the most recent EIA for TMI-1, the possible effects of a number of accidents that might occur at TMI-1.

(Id., 4374, n.9.)(Emphasis added.)

It is perhaps helpful to distinguish between two kinds of remote consequences and their relevance to the NEPA process. There are some kinds of environmental impacts which are of tangential concern. One might consider, for instance, a proposal which produces noise on a remote and uninhabited isle - an environmental impact, yes, but who cares? Nobody is bothered. Courts quite properly exercise a "rule of reason" and defer to the agency's judgment not to bother with this sort of remote effect. Quite different from that sort of "remote" effect is the situation of the sort we are dealing with here -- of an improbable (but unfortunately not impossible) impact which, if it occurred, would be catastrophic. Here NEPA must be observed in all its rigor.

The government in the present case repeats another mistake it made in Sigler. Here its representative, Lt. Col. Daley, testified that the environmental impacts of the MX if used in a nuclear exchange were too "speculative" to be used in an EIS. (Daley deposition, NR, 19, p. 72).40/ The Sigler Court of Appeals stated:

> The trial court and the Corps also misunderstand the role of 'speculation' in preparing a worst case analysis. The trial court acknowledged that a worst case analysis is 'somewhat speculative' by nature . . . . Yet . . . NEPA permits, even demands 'reasonable speculation,' see Scientists' Institute, 481 F.2d at 1092 . . . . As the Sierra Club claims, this case presents precisely the type of situation for which the worst case regultaion was designed . . . . The Corps . . . may not hide behind its ignorance of the worst case consequences and avoid confronting the costs of proceeding in the face of uncertainty. If the Corps decides to proceed with the issuance of these permits despite the uncertainty caused by this lack of information, the FEIS must be rewritten by the Corps to include a worst case analysis.

Sierra Club v. Sigler, supra, at 974-975.

The Court in Sigler held that the "catastrophic event" there being considered, a total cargo loss by a supertanker, "is undoubtedly a significant adverse impact." Id., at 973. "No party can seriously question," continued the Court, "the importance of the analysis . . . to this . . . decision." Id. We respectfully submit that an accident or a nuclear exchange involving the MX missile would be still more "undoubtedly a significant adverse impact." 41/ In this case, of course, plaintiffs were never able to get to the catastrophic impacts, since the district court went off on a tangential issue.

40 But see declarations cited in footnote 12 , supra. The measurement of such impacts is not speculative but is quite capable of being undertaken.

[page 60 omitted]

41 Other cases dealing with "worst case" analysis include Northern Slope Borough v. Andrus, 642 F.2d 589, 605 (D.C. Cir. 1980)), dealing with the prospect of a massive oil spill. There this Court affirmed the district court's holding that the "worst case" analysis contained in the EIS was a reasonable means of alerting the decisionmaker to the dangers presented by proceeding in the face of uncertainty.

(footnote 41 continued)

Another opinion where worst case analysis was treated at length is City of New York v. United States Department of Transportation, 539 F.Supp 1237 (S.D.N.Y. 1982), where the issue concerned a DOT final rule governing the transportation of radioactive materials through populated areas. In invalidating the government's action the Court stated:

> The agency has failed to fulfill its responsibilities under the National Environmental Policy Act ("NEPA"), 42 U.S.C. sec. 4321-4347 (1976), and under the regulations promulgated under NEPA by the Council on Environmental Quality and by DOT itself. In particular, DOT has failed adequately to evaluate and to address itself to the problems posed by low-probability/high-consequence occurences that are concededly "credible". NEPA requires that an agency confronted with these problems, fundamental in a society dependent on inherently dangerous technologies, conduct a thorough examination and make determinations that are susceptible to review concerning: (1) the probability of the occurrence contemplated; (2) the potential consequences of such an occurrence; and (3) the environmental risk reflected by the probability and the consequences estimated.

Id., at 1241-1242. The Court proceeded to a well considered analysis of the issues. (Id., at 1260-1265.) (We do note, however, that unlike the Court in Sigler, the Court in New York erroneously treated the CEQ NEPA Regulations, which are binding, as comparable to the predecessor CEQ Guidelines, which were not.)

Yet another case involving a "worst case" analysis dealt with the spraying of herbicides as part of Bureau of Land Management forest vegetation management program in Oregon. Southern Oregon Citizens Against Toxic Sprays v. Watt, 11 Env. Law Rptr. 20174, reconsid. den., 20176 (D. Ore. 1982). BLM was required by the court to include a worst case analysis in a subsequent annual environmental analysis of a program for which an earlier program EIS had been prepared. Id.

Also see the Ninth Circuit's opinion in Catholic Action of Hawaii v. Brown, 643 F.2d 569, 571-572 (9th Cir. 1980), rev'd on other grounds, 454 U.S. 139 (1981), discussed supra at 35-36.

c. A "Worst Case" Analysis Would Be Exceedingly Useful Here

We respectfully invite the Court's attention to that portion of the Statement of Facts covering the utility and the practicality of analyses and worst case studies of accidents or nuclear exchanges. (Supra, pp. 19-25).

The environmental analysis, required by law but avoided by the government, comparing different MX basing modes and alternative missile systems, would evaluate matters of fundamental importance. For instance, appropriate evacuation routes from the vicinity of nuclear power plants are required by the NRC in anticipation of the possibility of a nuclear accident. See 10 C.F.R. 50.47 and 10 C.F.R., Part 50, App. E. The Air Force's NEPA documents disclose no such planning as a condition precedent to their siting a nuclear facility. In another example, if an enemy preemptive attack were aimed at land-based MX missiles operated by the Air Force, rather than sea-based Poseidon or Trident missiles operated by the Navy, 42/

42 Environmental impact statements must not restrict the considerations of alternatives to those within the jurisdiction of the particular preparing agency. As this Court has instructed:

> While the Department of the Interior does not have the authority to eliminate or reduce oil import quotas, such action is within the purview of both Congress and the President, to whom the impact statement goes. The impact statement is not only for the exposition of the thinking of the agency, but also for the guidance of these ultimate decision-makers, and must provide them with the environmental effects of both

the level of destructive nuclear force the domestic United States would endure would be dramatically different in terms of harm inflicted on urban population centers, croplands, natural resources, and the like. MacKenzie Declaration, NR. 30, App. p. 123. Indeed, the differences in environmental impact posed by these different weapons systems and their different basing modes are so staggering and potentially important to the future of our nation and of the entire human race that it is difficult to comprehend how a decision choosing among the alternatives could reasonably be made without considering them -as the Air Force proposes to do. See generally MacKenzie and Scoville Declaration, NR. 17 and 30, App. pp. 117-179. As discussed in the Statement of Facts, analyses may include such informative material of interest to affected citizens as maps

(footnote 42 continued)

> the proposal and the alternatives, for their consideration along with the various other elements of the public interest.

NRDC v. Morton, supra, 458 F.2d 827, 835 (D.C. Cir. 1972). The EIS makes it possible for "'those removed from the initial process' -in other agencies, in Congress, and in the public -'to evaluate and balance the factors on their own.'" Calvert Cliffs Coord. Comm. v. AEC, 449 F.2d 1109, 1113 (D.C. Cir. 1971); State of Alaska v. Andrus, 580 F.2d 465, 474 (D.C. Cir. 1978), another part vacated, 439 U.S. 922 (1978); Council on Environmental Quality, Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, 46 Fed. Reg. 18026, 18027 (Mar. 23, 1981). Here, of course, the Defense Department has abdicated to the Air Force, which did not consider alternatives within the jurisdiction of the Navy.

showing projected impacts on the "human environment" in the vicinity of where people live. (Supra, at pp. 19-25.)43/

Federal agencies besides the Air Force would be able to comment upon the environmental differences between alternatives and contribute their expertise on the relevant impacts through the EIS preparation process - an opportunity currently denied to them by the Air Force's refusal to study and compare the environmental impacts of these weapons in case of accident or if used. 44/

43 When the "scoping" hearings (40 C.F.R. 1501.7) were held on land acquisition in Nevada and Utah for the now discarded "racetrack" basing mode, which thousands of citizens attended, concerns about nuclear impact dominated citizen response in the larger hearings. Daley deposition, NR. 19, plaintiffs' exhibit 8.

44 The Air Force by its failure to examine severe consequence impacts has avoided the interagency consultation process that is so crucial to NEPA's success. Generally, see Caldwell, Science and the National Environmental Policy Act, Redirecting Policy Through Procedural Reform, supra (1982). Prior to preparing an environmental impact statement the responsible official is required by NEPA to "consult with and obtain the comments of any federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved." NEPA §102(2)(C). The CEQ NEPA Regulations then define "jurisdiction by law" (40 C.F.R. 1508.15) and "special expertise" (40 C.F.R. 1508.26). Appendix II to the CEQ NEPA Regulations lists the agencies so defined by subject areas of jurisdiction and expertise. 45 Fed. Reg. 57488 (August 28, 1980). The agencies with jurisdiction or expertise in the area of "radiation" include: Department of Commerce (National Bureau of Standards), Department of Energy (Office of Environment), Department of Health and Human Sciences (Public Health Service), Department of Housing and Human Development, Department of Interior (six subagencies), Department of Labor (two subagencies), Department of Transportation, Environmental Protection Agency, Federal Emergency Management Agency, Nuclear Regulatory Commission, and in one geographical area the Tennessee Valley Authority. Id., at 57495-57496. NEPA further requires that the statement and "the comments and views of the appropriate Federal, State, and local agencies, which are

2. Opportunities Will Arise Now and In the Future For the Congress, the Federal Agencies, and the Public to Use the MX EIS for Future Decisionmaking

During the pendency of this case, while the required environmental impact studies remained unperformed, Congress has taken the initial steps to authorize the procurement of the first 27 MX missiles of 100 now proposed. See H.R. Rep. 98-137, 98th Cong., 1st Sess. (1983), supra, n.4. 45/ Clearly the program is an ongoing one, with public debate, Congressional consideration, and executive requests for authorization for additional procurement (e.g., the remaining 73 MX missiles) yet to come. Indeed, while the Air Force has no procurement funds for the MX for FY 1983, it projects such outlays for FY 1984 through FY 1989. S. Rep. 98-85, 98th Cong., 1st. Sess. 10 (1983). (It also projects a total of 223 MX missiles. Id.) The EIS prepared now will serve to illuminate and provide a factual

(footnote 44 continued)

authorized to develop and enforce environmental standards" be made available to the President, CEQ, and the public. NEPA §102(2)(C).

45 No procurement funds were made available by virtue of the resolution approving the President's report. H.R. Rep. 98-196, 98th Cong. 1st Sess. 2 (1983).

basis for these ongoing debates and decisions in a manner that serves the letter, the spirit, and the purpose of NEPA.46/

CONCLUSION

A. Relief Sought

Plaintiffs respectfully request this Court to reverse the decision of the Court below and declare the obligations of the Secretaries of Defense and of the Air Force under NEPA to prepare an environmental impact statment on the proposal to procure, produce, and deploy the MX missile, which statement must include an analysis of the low probability/severe consequence environmental effects of accident or use. 47/

46 NEPA's requirements for ongoing scrutiny of continuing programs were often discussed in the context of programs which were ongoing when NEPA was first enacted. See, e.g., Arlington Coalition v. Volpe, 458 F.2 1323 (4th Cir. 1972); Environmental Defense Fund v. T.V.A., supra, 468 F.2d 1164, 1176-1178 (6th Cir. 1972). Of course, the fact that an EIS is not required for a request for appropriations does not relieve the government of "responsibility to prepare statements when otherwise required in the underlying program or other actions." Andrus v. Sierra Club, supra, 442 U.S. 347, 357, n.17 (1979).

47 Plaintiffs note that the entire record, which revolves around questions of law, is before the Court. They request this Court to decide the substantive issues of the case, which are discussed in this brief. See In Re Permian Basin Area Rate Cases, 390 U.S. 747, 823-824 (1968). Alternatively this Court might reverse the holding of the Court below on the issue of the scope of the Jackson Amendment, give guidance on the other issues of law, and remand with directions to proceed in accordance with the opinion of the Court. The disadvantage to this course is that it would be more time consuming.

B. Plaintiffs' Concluding Request

The government fundamentally misconceives the purposes of NEPA and of the implementing CEQ NEPA Regulations. Eleven years ago this Court, in what is still the leading NEPA case, cautioned lest important legislative purposes, heralded in the Halls of Congress, become "lost or misdirected in the vast hallways of the Federal Bureaucracy." Calvert Cliffs Coordinating Committee v. A.E.C., supra, 449 F.2d 1109, 1111 (D.C. Cir. 1971), cert. denied, 404 U.S. 942 (1972). The Pentagon's hallways are clearly no less vast than those of the rest of the Federal Bureaucracy, the intransigence no less persevering.

This Court's concern for the integrity of NEPA and for the fulfillment of the Congressional purposes that it embodies is shared by other courts. Thirteen years ago, in the opening lines of the first NEPA case to reach a Court of Appeals, the Fifth Circuit said:

> It is the destiny of the Fifth Circuit to be the middle of great, oftentimes explosive issues of spectacular public importance. So it is here as we enter in depth the contemporary interest in the preservation of our environment. . . . We hold that nothing in the statutory structure compels the Secretary to close his eyes to all that others see or think they see. The establishment was entitled, if not required, to consider ecological factors and, being persuaded by them, to deny that which might have been granted routinely five, ten or fifteen years ago before man's explosive increase made all, including Congress, aware of civilization's potential destruction from breathing its own polluted air and drinking its own infected water and the immeasureable loss from a silent-spring-like disturbance of nature's economy.

Isbell v. Tabb, 430 F.2d 199, 200-201 (5th Cir. 1970). Today, as concern over the effects of nuclear weaponry on the human environment assumes a comparable public importance, we again return to the procedures of the National Environmental Policy Act.

Procedures may be said to be what make a system of ordered liberty work. Plaintiffs here seek not to overturn decisions best left to coordinate branches of government, but rather seek to insure that the Executive Branch follows the procedures the Legislative Branch has prescribed. In that way the public will be involved in the decisionmaking, the relevant information will be widely available, and consideration of the environmental impacts - including the most potentially severe ones - will assume their proper place in Executive, Legislative, and public debate and decision.

Respectfully submitted,

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ADDENDUM

Pertinent Statutes and Regulations

National Environmental Policy Act
(Section 102(2)(C))

Sec. 102 The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall-- . . .

(C) Include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on--

(i) The environmental impact of the proposed action,
(ii) Any adverse environmental effects which cannot be avoided should the proposal be implemented,
(iii) Alternatives to the proposed action,
(iv) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
(v) Any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

Prior to making any detailed statement, the responsible Federal official shall consult with and obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of such statement and the comments and views of the appropriate Federal, State and local agencies, which are authorized to develop and enforce environmental standards, shall be made available to the President, the Council on Environmental Quality and to the public as provided by section 552 of title 5, United States Code, and shall accompany the proposal through the existing agency review processes;

Jackson Amendment

(adding unnumbered sections to DOD Appropriations Act of 1983, passed as part of continuing resolution PL 97-377, 90 Stat. 1830 (1982))

RESEARCH, DEVELOPMENT, TEST, AND EVALUATION, AIR FORCE

For expenses necessary for basic and applied scientific research, development, test, and evaluation, including maintenance, rehabilitation, lease and operation of facilities and equipment, as authorized by law; $10,650,661,000. to remain available for obligation until September 30, 1984. Provided, That none of the funds appropriated in this Act may be obligated or expended to initiate full scale engineering development of a basing mode for the MX missile, until such basing mode is approved by both Houses of Congress in a concurrent resolution, as specified in subsection (1) hereof.

(1) For the purposes of this section, the term "concurrent resolution" means only a resolution introduced in either House of Congress, the matter after the resolving clause of which is as follows: "That the _____ approves the obligation and expenditure of funds appropriated in Public Law _____ for MX missile procurement and full-scale engineering development of a basing mode for the MX missile," the first blank space therein being filled with the name of the resolving House, and the second blank space being filled with the public law number of this statute. It shall not be in order to introduce any such resolution prior to the receipt by the Congress of the report of the President required under subsection (7).

(2) A resolution in the Senate shall be referred to the Committee on Appropriations of the Senate. A resolution in the House of Representatives shall be referred to the Committee on Appropriations of the House of Representatives.

(3) If the committee to which is referred the first resolution introduced in the Senate or the House, as the case may be, expressing approval of the obligation and expenditure of funds referred to in this subsection has not reported the resolution at the end of 45 calendar days after the introduction of a resolution pursuant to subsection (1) hereof, such committee shall be automatically discharged from further consideration of the resolution and the resolution shall be placed on the calendar of the Senate, in the case of a resolution of the Senate, or the Union calendar, in the case of a resolution of the House of Representatives.

(4) When the committee has reported a resolution or been discharged under subsection (3) hereof it is at any time thereafter in order (even though a previous motion to the same effect has been disagreed to) to move to proceed to the consideration of the resolution. The motion is highly privileged in the House and is privileged in the Senate and is not debatable. The motion is not subject to amendment, or to a motion to postpone, or to a motion to proceed to the consideration of other business. A motion to reconsider the vote by which the motion is agreed to or disagreed to shall not be in order.

(5)(A) Debate on the resolution shall be limited to not more than fifty hours, which shall be divided equally between those favoring and those opposing the resolution. A motion further to limit debate is not debatable. An amendment to, or motion to recommit, the resolution is not in order. A motion to reconsider the vote by which the resolution is agreed to or disagreed to is not in order.

(B) Motions to postpone and motions to proceed to the consideration of other business shall be decided without debate.

(C) Appeals from the decisions of the Chair relating to the application of the rules of the Senate or the House of Representatives, as the case may be, to the procedure relating to a resolution shall be decided without debate.

(6) Subsections (1) through (5) are enacted by the Congress--

(A) as an exercise of the rulemaking power of the Senate and the House of Representatives, respectively, and as such they are deemed a part of the rules of each House, respectively, but applicable only with respect to the procedure to be followed in that House in the case of resolutions described in subsection (1), and they supercede other rules only to the extent that they are inconsistent therewith; and

(B) with full recognition of the constitutional right of either House to change the rules (so far as relating to the procedures of that House) at any time, in the same manner and to the same extent as in the case of any other rule of that House.

(7)(A) The President shall submit a report to the Committees on Appropriations and Armed Services of the Senate and the House of Representatives, not earlier than March 1, 1983, containing:

(i) a detailed technical assessment of the closely spaced basing system transmitted by the President to Congress on November 22, 1982 or such modifications thereto as the President determines to be advisable;
(ii) a detailed technical assessment of other MX basing systems that might serve as alternatives to the closely spaced basing sysem transmitted by the President to Congress on November 22, 1982;
(iii) a detailed technical assessment of different types of intercontinental ballistic missiles that might serve as alternatives to the MX missile; and
(iv) A comparative detailed technical assessment of alternative programs including acceleration of the Trident II program to provide target coverage equivalent to that of the MX missile system, enhancements and improvements to the Minuteman missile force, and development and deployment of a land-based missile system in deep underground basing, multiple protective shelters and closely spaced basing incorporating mobility and deception, a road mobile missile smaller than the MX and a common missile for land and sea deployment.
(v) a reaffirmation by the President of his selection of the MX missile basing plan transmitted by Congress on November 22, 1982 or a proposal for an alternative basing plan.

(B) The President shall also include in the report submitted pursuant to paragraph (A) an assessment of the military capability of each alternative system or missile; an assessment of the survivability of each such system or missile against current and projected Soviet threats; an assessment of the projected cost of each such system or missile and possible upgrades thereof; an assessment of the impact each such system or missile might have on present and future arms control negotiations; an assessment of the geographic, geological, and other qualifications a site for each such system or missile would likely require; an assessment of the environmental impact each such system or missile would likely have; and the identification of possible sites for each such system or missile.

(C) The report required under this subsection shall not be subject to the requirements of section 102(2)(C) of the National Environmental Policy Act of 1969, relating to environmental impact statements.

Provided further, That notwithstanding any other provision of this Act, no initial flight test of the MX missile may be conducted until after both Houses of Congress have agreed in accordance with the provisions of subsections (1) through (5) of

the preceding proviso, to a concurrent resolution approving the obligation and expenditure of funds for full-scale engineering development of a basing mode for such missile. [Emphasis added.]

Council on Environmental Quality

NEPA Regulations
40 C.F.R. 1502.22

§1502.22 Incomplete or unavailable information.

When an agency is evaluating significant adverse effects on the human environment in an environmental impact statement and there are gaps in relevant information or scientific uncertainty, the agency shall make clear that such information is lacking or that uncertainty exists.

(a) If the information relevant to adverse impacts is essential to a reasoned choice among alternatives and is not known and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement.

(b) If (1) the information relevant to adverse impacts is essential to a *reasoned choice* among alternatives and is not known and the overall costs of obtaining it are exorbitant or (2) the information relevant to adverse impacts is important to the decision and the means to obtain it are not known (e.g., the means for obtaining it are beyond the state of the art) the agency shall weigh the need for the action against the risk and severity of possible adverse impacts were the action to proceed in the face of uncertainty. If the agency proceeds, it shall include a worst case analysis and an indication of the probability or improbability of its occurrence. [Emphasis added.]

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No. 83-1438

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Plaintiffs-Appellants

v.

CASPAR W. WEINBERGER, et al.,

Defendants-Appellees

On Appeal from the United States District Court
For the District of Columbia

Honorable Barrington D. Parker, Judge Presiding

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REPLY BRIEF FOR APPELLANTS

INTRODUCTION

The Government in its brief pursues its unerring instinct for the capillary. This case involves NEPA and an exemption to it in the "Jackson Amendment," the precise contours of which are

central to this appeal. It also involves a proposal of the greatest environmental significance - the MX missile system. The rules for construing NEPA exemptions are clear. (Brief for Appellants, pp. 27-28.) The "only time" an agency can avoid compliance with NEPA is in the case of "a clear and unavoidable conflict in statutory authority . . . ." Id. Such a conflict does not exist here. Id., at 38-43.

The bulk of the Government's brief, discussing a quite different statutory scheme having nothing to do with NEPA (Brief for Appellees, pp. 15-25),[1] seeks to invite this Court to depart from NEPA and the settled rules for construing exemptions to it. We respectfully submit that justice will best be served by this Court's declining the Government's invitation to pursue non-NEPA analogies and instead adhere to the clear NEPA case law.

We will not in this brief repeat discussions previously made in our principal brief, but will confine ourselves to replies to other matters in the Government's brief. Throughout

[1] The inapposite statutory scheme relied upon by the Government is discussed in Appellants' Brief at pp. 48-50, n.32. It was discussed at greater length below. Plaintiffs' Statement of Points and Authorities in Opposition to Defendants' Motion to Dismiss, NR. 17, at 9-13.

we have tried to substitute references to the record for lawyers' imaginings.[2]

I. THE RECORD SHOWS THAT THE AIR FORCE PROPOSAL FOR THE MX, WHICH HAS CONTINUED UNABATED FOR OVER A DECADE, IS NOW COMING TO FRUITION

The Government now appears to claim that the Jackson Amendment temporarily killed the MX proposal so that when the President submitted his report to Congress required by that amendment it was somehow a new proposal, scrubbed free of NEPA obligations. (Brief for Appellees, pp. 9-15.) The facts, the record, and the law rebut the Government's assertion.

[2] The Government persistently characterizes all the Plaintiffs-Appellants in this case as the "MX Opponents." Brief for Appellees, p. 2 et seq.) This is an inaccurate generalization. While in other fora certain of the Plaintiffs have addressed defects in the MX proposal, the present lawsuit is not an appropriate occasion either to support or oppose the MX proposal. We deal here with the construction of NEPA and a statutory exemption to it. Others of the Plaintiffs have taken no position either pro or con on the merits of the MX proposal. Their interest is solely in insuring that the Government, in compliance with the law, studies and discloses the effects of its proposal, including the most severe effects, so that the public and its representatives may make informed decisions.

The Government further labels Plaintiffs as "several environmental and anti-nuclear organizations." Brief for Appellees, p. 2. This is again a partially accurate characterization. We are unsure, for instance, in which category the Government proposes to place the United Church of Christ or the Wyoming Council of Churches which includes among its members a majority of the people of Wyoming.

The Government also "suspects" Plaintiffs want to debate the merits of the MX. Brief for Appellees, p. 34. The Government is wrong. There has been and will be continuing debate on the MX. It is our purpose in this proceeding only to illuminate that debate with the facts and analysis Congress required in enacting NEPA.

A. The MX Proposal Is the Air Force's and Always Has Been

For the Government to assert that the MX proposal was that of President Reagan in April, 1983, is to repeal history. The tale of the development of the MX proposal is a longer one than that. It is one that takes place under four Presidents, but one for which recent NEPA compliance is wanting. Brief for Appellants, pp. 10-19. The MX proposal started in the Air Force and was developed in the Air Force. The facts concerning the Government's actions during the period of the Congressional hold imposed by the Jackson Amendment are at odds with the Government's present contention that somehow the proposal died, only to rise again from the ashes, phoenix-like, somehow cleansed of prior NEPA obligations.

As the facts show, the Air Force made the MX proposal and stuck by the proposal throughout the relevant period and until this day.

1. When the Government's NEPA Responsibilities Arose As A Matter of Law

Let us first examine the law. NEPA requires environmental impact statements to be submitted by the "responsible official" on "every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment." (§102(2)(C), 42 U.S.C. 4332 2 (C). Emphasis added.)

The agency here the Departments of Defense and of the Air Force must begin preparing an environmental impact statement "as close as possible to the time the agency is developing or is

presented [3] with a proposal." 40 C.F.R. 1502.5 App. p. 107 see: 40 C.F.R. 1508.23 App. p. 109. Emphasis added. The statement is to be prepared early enough so that it can serve as an important contribution to decisionmaking and will not be used to rationalize or justify decisions already made. 40 C.F.R. 1502.5 App. p. 107. Preparation of the statement is to be timed "so that the final statement may be completed in time for the statement to be included in any recommendation or report on the proposal." 40 C.F.R. 1508.23. Statements for projects directly undertaken by Federal agencies such as this one must be prepared at the feasibility analysis stage. 40 C.F.R. 1502.5 a App. p. 107, quoted with approval in Andrus v. Sierra Cl. b, 442 U.S. 347, 351-352, n.3 (1979).

In order to determine NEPA responsibilities, it is therefore essential to look at when in fact there was a "proposal" and a "recommendation" or a "report" and who was the "responsible official."

a. The Record Shows The MX "Proposal" Was Developed in the Air Force

Where was the "proposal" (NEPA, 102(2)(C) for the MX missile "developed" (40 C.F.R. 1502.5)? In the words of the official selected by the Air Force to testify on this: [4]

> Q. (Mr. Yost) Who basically developed the MX missile?

[3] The term "presented with" refers to the situation when an applicant outside the government develops a proposal (such as a proposed oil lease or Federal grant). It is inapplicable here.

[4] Notice to Take Deposition, Rule 30(b)(6), NR. 6, paras. 1 and 3; Exhibit 4 to Daley deposition, N.R. 19). See: n.15, infra.

A. [Lt. Col. Politi] The requirement for the MX missile was identified by the Strategic Air Command in the late 1960's and early 1970's. That requirement was validated by the Air Staff in 1972. The Air Staff in turn directed the Air Force Systems Command to develop a concept that would fulfill that requirement. The Air Force Systems Command in turn tasked the Ballistic Missile Office. The Ballistic Missile Office is actually the agency that developed and defined the concept for the MX, both the missile and the variety of basing modes that have been evaluated over the years, and of course, there have been many individuals who have participated in that process. (Politi deposition, N.R. 19, pp. 37-38.

b. The Record Shows The "Responsible Official" for the MX Proposal Was in the Air Force

Who was the "responsible official" (to use the NEPA term) for the MX proposal? The "responsible official" was throughout the history of the MX within the departments headed by Appellees. All the environmental analyses and other NEPA documents with respect to the MX were prepared by or for the Air Force as distinct from the Department of Defense. (Daley deposition, N.R. 19, p. 9.) Air Force Systems Command was responsible for the test program for the Buried Trench deployment mode for the MX missile. (Id., at 9-10.) Lt. Col. Daley (see p. 15, infra) did not know the specific individual in Systems Command (Id., at 10), but General Slay and then General Marsh were in charge of Air Force Systems Command during the relevant period. (Id., at 13, 26-27.

The responsible official with respect to the Milestone II EIS, examining primarily basing mode, was the Air Force Systems Command, Ballistic Missile Office. Id. at 10-11.) Subsequent

to the completion of the Milestone II EIS the Air Mobile deployment mode was added. The Air Force Systems Command, Ballistic Missile Office, was responsible for the EIS. (Id., at 11-12.) This is "normal procedure with development of a new system." (Id., at 12.) The Air Force Systems Command is "responsible for the development of all new systems, the weapons systems and other systems the Air Force uses, as part of their normal procedures." Id. Air Force Systems Command "performs an environmental analysis and assessments or impact statements as required." (Id.)

With respect to the legislative environmental impact statement (LEIS) relating to Closely Spaced Basing, the official responsible was the Air Force Regional Engineering Office, at Norton Air Force Base, California, under the command (since 1980) of Brigadier General Lamb. (Id., at 14-15. (A special task group had been formed to deal with the multiple protective shelter mode because of the magnitude of the task (Id., at 14).) Brigadier General Lamb "would be the person whose job includes preparation of environmental impact statement." (Id.) It was prepared in close concert with the Ballistic Missile Office at Norton Air Force Base. (Id.)

With respect to identifying the "responsible official", a January 15, 1982, meeting of EXCOM [5] on how to base the MX

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[5] EXCOM was an advisory and coordinating committee composed of officials from the Office of the Secretary of Defense and the Departments of the Air Force, Army, and Navy. Stipulated Chronology, NR. 17, p. 1.

Stipulated Chronology, NR. 17, p. 1; Daley deposition, NR. 19, p. 26) was held at the request of either Dr. DeLauer [6] or Mr. T. K. Jones [7] (Politi deposition, NR. 19, p. 11). The briefing on the MX at that meeting was given by Brigadier General James McCarthy, then Special Assistant for MX matters. (Id., at 12. Under Secretary DeLauer presides over the EXCOM panel. Id., at 14. Deputy Under Secretary Jones presides over the subpanel. Id.

At a April 9, 1982, meeting of EXCOM the presentation was made by Lieutenant General Burke, Deputy Chief of Staff, Research and Development. (Id., at 16.) General Burke also briefed the Secretary of Defense the same day. (Id.) Both the April 9, 1982, EXCOM meeting and the briefing of the Secretary of Defense were called for by Under Secretary DeLauer. (Id., at 17). [8] It was the "recommendation" of the EXCOM to

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[6] Dr. Richard DeLauer, Under Secretary of Defense for Research and Engineering.

[7] Thomas K. Jones, Deputy Under Secretary of Defense for Research and Engineering.

[8] With respect to reports and recommendations concerning the MX proposal to the Secretary of Defense, since 1981 they are said to have been oral rather than written. Lt. Col. Politi testified that there were no written reports or minutes. Everything was oral. Id., at 17-18. In fact for the last year and a half all major matters with respect to the MX program have been "reported on" orally rather than in writing. In the words of Lt. Col. Politi:

> Q. [Mr. Yost] Was everything to do with presentation to the Secretary of Defense on CSB oral rather than in writing.
> A. [Lt. Col. Politi] Yes, it was.
> Q. Is that at other times as well as this time?

 (footnote cont.)

Under Secretary DeLauer that the idea be submitted to the Secretary of Defense. (Id.)

c. The Record Shows The "Proposal" Stage for the MX was Reached During the Course of Air Force Development

The Air Force proposal [9] to procure, produce, and deploy the MX missile first publically surfaced when the Air Force

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Footnote Continued

> A. Yes, Sir. Well, there have been occasions, for example, in September we provided a written report, technical evaluation of closely spaced basing concept, but normally our presentations on the MX program in General [sic] have been oral presentations and not written.
> Q. Is that the usual situation, for major matters to be reported on orally rather than in writing, at the Secretary of Defense level?
> A. In the past year and a half with regard to the MX program that has been the case, yes, sir."

The only "written report" was the CSB report submitted to the Secretary of Defense "recommending" deployment of the MX in the closely spaced basing mode. (Id., at 25.) This was a "technical evaluation." (Id., at 18.)

[9] See NEPA, §102(2)(C); 40 C.F.R. 1508.23. The "proposal" for the MX must be distinguished from the decision. As noted by the First Circuit in another NEPA case:

> "Even if, as the government urges, the President is not an 'agency' subject to the requirements of NEPA, it is clear that the President did not make the 'proposal' to use Fort Allen. At most, the President made the decision to utilize Fort Allen."

Marquez-Colon v. Reagan, 683 F.2d 611, 615 n.3 (1st Cir. 1981).

In an earlier case this Court held that Presidential completion of a statutory requirement personally to approve a project in no way relieved the responsible agency of its obligation to comply (footnote cont.)

asked for legislative authorization [12] to procure the MX missile. Admission 39, NR. 14, 17; Politi deposition, NR. 19, p. 29; see: Weinberger testimony (p. 12), Exhibit F to Yost declaration, NR. 17; Joint Chiefs of Staff, "United States Military Posture" (p. 71), Exhibit G to Yost declaration, NR.

Footnote continued

with NEPA. These were two separate requirements, each of which had to be satisfied. Committee for Nuclear Responsibility v. Seaborg, 463 F.2d 783, 791 (D.C. Cir. 1971), inj. den. 404 U.S. 912 (1971).

Similarly, the courts have not hesitated to pierce the institutional veil to see who really formulated the proposal. A district court quoted the CEQ NEPA Regulation and continued as follows:

> "'Legislation' is defined by the CEQ as including: '. . . a bill or legislative proposal to Congress developed by or with the significant cooperation an support of a Federal agency, but does not include requests for appropriations. The test for significant cooperation is whether the proposal is in fact predominantly that of the agency rather than another source.' 40 C.F.R. 1508.17 (1979). The record makes clear that although the directive itself was sent from the President to Secretary Andrus, the 'leg work' was that of the Department of the Interior, and therefore the 'significant cooperation' test is satisfied and the proposal under consideration is a legislative proposal."

North Dakota v. Andrus, 482 F.Supp. 255, 259, n.5. (D.N.D. 1980). Emphasis added.

[13] See Andrus v. Sierra Club, supra, at 359, n. 16, with respect to the significance for a request for authorization which may require an EIS as distinguished from a request for appropriations which does not. It is Plaintiffs' position that, whether or not some earlier or other stage in the development of the MX proposal was also the occasion for the MX EIS, as a matter of law the proposal for legislative authorization for MX procurement was such an occasion. NEPA, §102(2)(C).

17, App. pp. 183-222. [14] The EIS was due not later than at that time. NEPA requires EISs for "proposals for legislation" and for "other major Federal actions" significantly affecting the quality of the human environment. §102(2)(C). While the Air Force had long promised an EIS on the MX itself the proposal to produce and deploy it Brief for Appellants, pp. 17-19, and there exists some agency latitude as to timing 40 C.F.R. 1502.5, 1508.23), the EIS certainly was due by the time it became a legislative proposal (i.e., at the time of Appellees' request for authorizing legislation Brief for Appellants, pp. 18-19). As the record shows, that time has arrived.

2. The Air Force's MX Proposal Never Ceased to Be a Proposal During the Time of the Congressional Hold Imposed by the Jackson Amendment

To accept the Government's insinuation that somehow the MX proposal of 1983 is a different proposal from the MX proposal of 1982, 1981, 1980, or any of a number of previous years is to attenuate credulity. The MX has been a developing proposal over many years. See Statement of Facts, Brief for Appellants, pp. 10-15. Adherence to the MX proposal continued through the present administration. As aptly put by Secretary Weinberger:

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[12] As Lt. Col. Politi's testified:

> Q. Mr. Yost With respect to the MX, when did the Defense Department, the Air Force, first request authorization for procurement of the MX missile?
> A. Lt. Col. Politi As part of the fiscal year 1981 budget request, which was submitted in January, 1980.

Politi deposition, NR. 19, p. 29.

> Senator Pell. In the past 2 years in connection with the MX, over the last 18 months was any serious thought given within the administration to abandon MX?
>
> Secretary Weinberger. No. I do not think so, sir . . . . [15]

The Government's carrying out of the MX proposal was not interrupted by the Congressional hold on a portion of the MX spending during preparation of the President's "report" required by the Jackson Amendment mid-December, 1981 - mid-April, 1982.

Again to quote Secretary Weinberger from a news conference statement during the period of the Congressional hold:

> The MX R&D funding that was approved by the Congress and the procedures adopted for the release of additional funds can enable us, if final approval is received this year, to keep our planned IOC (initial operational capacity). [16]

And again:

> Q. Mr. Secretary, did you have any disappointments this year? It sounds like it's a pretty good year.
>
> A. Well, we have a lot of things that we would have preferred gone somewhat the other way. Certainly the MX was not killed and

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[15] Hearings on U.S. Strategic Doctrine Before the Committee on Foreign Relations, United States Senate, 97th Cong. 2d Sess., at 136 Dec. 14, 1982 (see H.R. Rep. 98-197, Department of Defense Authorization Act, 1984, 98th Cong. 1st Sess. 14, 144-146 (1983).

[16] Transcript of "News Conference by Secretary of Defense Caspar W. Weinberger at the Pentagon Thursday, December 30, 1982 -- 10:00 a.m." at 2. (Transcript furnished by DOD to Plaintiffs in response to a Freedom of Information Act request.)

> any program that has $2.5 billion appropriated for it is not really dead. We are worried about the delay. But again, as I indicated in the statement, the procedures are there for bringing the fence down that can enable us to meet the IOC for that program and I think it's very important that we do. [17]

The record below further buttresses the Government's continued adherence to the longstanding MX proposal. Lt. Col. John J. Politi, USAF Deputy Special Assistant for MX Matters [18] testified as follows again during the period of the Congressional hold, when the Government now would have us believe the MX proposal was killed by the Jackson Amendment:

> Q. Mr. Yost You had referred to 1986. What is the significance of that date?
>
> A. Lt. Col. Politi That is the time that President Reagan directed the MX be deployed operationally. Late 1986 is the directed time.
>
> Q. Isn't that the same date that had been dated to become operational for Race Track under President Carter?

---

[17] Id. at 7.

[18] Lt. Col. Politi was Deputy to Brigadier General Gordon Fornell, who was the Special Assistant for MX. Politi deposition, NR. 19, p. 4. General Fornell was Special Assistant to Lieutenant General Skantze, who was Deputy Chief of Staff for Research, Development and Acquisition, Headquarters, U.S. Air Force. Id., pp. 4-5. Lt. Col. Politi was testifying in response to a FRCP 30 (b)(6) notice directing the Departments of Defense and of the Air Force to designate an officer to testify on behalf of the Departments with respect to "The proposal to procure, produce, and deploy the MX missile system." Date deposition, NR. 19, p. 2; Id., Plaintiffs' Exhibit No. 4

A. The original deployment date was July, 1986, so it is about a six-month difference in time.

Q. That is still the date which is the intended date for MX becoming operational, is that accurate?

A. Yes, sir, that's correct.

Politi deposition, NR. 19, pp. 27-28; see: id., pp. 34-35. Emphasis added.)

In January, 1983 (again during the period when the Government would now have us believe the MX was dead), the Air Force asked the Congress to approve the military construction activities that would be used to support the MX system. Daley deposition, NR. 19, pp. 21-22.

The Air Force's procedures for implementing the National Environmental Policy Act with respect to the MX proposal also continued during the period of the Congressional hold imbridled by Justice Department arguments concerning the Jackson Amendment. About the first of the year 1983, during the hold imposed by the Jackson Amendment, a new consulting firm (R.S Burger) came on contract with respect to NEPA and siting the MX in the vicinity of F.E. Warren Air Force Base, Wyoming. Id., pp. 34-35.

In January, 19[illegible], approximately the middle [illegible] the Congressional hold, the Air Force placed its Notice of Intent to Prepare Environmental Impact Statement on the MX's land area and site selection in the Federal Register. 48 Fed. Reg. 2160 (Jan. 18, 1983). That Notice specified,

> The United States Air Force, Department of Defense, will prepare an environmental impact statement (EIS) for use in decision-making regarding the selection of land areas and sites for the proposed deployment and operation of the Peacekeeper strategic weapon system which is an advanced land based, intercontinental ballistic missile.

Id. The notice specified that the proposal involved basing 100 Peacekeeper MX missiles in 100 silos near F.E. Warren AFB, Wyoming. Id., at 2167.

On February 7, 1983, Lt. Col. Peter Daley, Assistant for Environmental Quality in the Office of the Assistant Secretary of the Air Force (Daley deposition, NR. 19, pp. 4-5), testified that the Air Force's contractor was

> looking at various siting alternatives within the F.E. Warren region where we can put the actual missile arrays or array, depending on what the recommendation is, in order to minimize environment[illegible] impacts of the deployment in that region.

Id., p. 14. The contractor had completed the public scoping meetings as of the previous week (i.e., about February 1, 1983). Id., p. 9. The public scoping meetings were held in or [illegible] Cheyenne, and a federal agency scoping meeting was held in Denver. Id.

[illegible] the process required by the Council on Environmental Quality's NEPA Regulations for determining the scope of issues to be addressed in an environmental impact statement.

In February, [illegible] the Air Force was in the process of preparing a [illegible] Environmental Impact Statement with respect to the deployment of the MX missile, including the facilities and equipment that would be required. Id. The site specific E.I.S. for F.E. Warren Air Force Base, which is discussed above, was part of that [illegible] Id. The Air Force's plan was to [illegible] Id.

[illegible] Peacekeeper MX [illegible] Analysis Process (EIAP) is proceeding with planning activities for Peacekeeper deployment at F.E. Warren AFB. We are also working with other [illegible] a notice of intent to prepare an EIS [illegible] decision-making regarding the selection of land areas and sites for the Peacekeeper system.

[illegible] Id., where [illegible] MX.

[illegible] Air Force's [illegible] Force's decision [illegible] Force's [illegible] Warren AFB, Wyoming, [illegible] Minuteman [illegible] the Air Force [illegible] Peacekeeper [illegible] Warren [illegible] Id. [illegible] Id.

[illegible] Congress [illegible] Air Force [illegible] Id. [illegible] Id. [illegible] Id.

(D.C. Cir. 1981). Here it did not. Similarly, the President's "decision" is quite a different thing from the agencies' "proposal." Marquez-Colon v. Reagan, supra, 683 F.2d 611, 615 n.3 (1st Cir. 1981).

Further, in this particular case the acknowledged obligation to prepare a site-specific EIS for the placement of the MX, conceded by the Government (Brief for Appellees, pp. 13-14, n.5), rebuts its assertion that the legislative exemption for the President's "report" 19/ expunged all NEPA obligations with respect to the MX.

II. PLAINTIFFS WELCOME THE GOVERNMENT'S CONCESSION - THAT IT WILL PREPARE ANALYSES OF POSSIBLE MX ACCIDENTS - AND REMIND IT OF ITS NEPA OBLIGATION TO PREPARE WORST CASE ANALYSES FOR OTHER IMPROBABLE BUT POSSIBLE OCCURRENCES

A. Plaintiffs Welcome The Government's Concession With Respect to MX Accidents

The Government has for the first time conceded that NEPA requires that its environmental impact statement process with respect to the MX include accidents. 20/ The site-specific EIS will analyze "possible accidents . . . involving the missile components" in the selected deployment location, F.E. Warren Air Force Base, Wyoming. 21/ (Brief for Appellees, pp. 13-14, n.5; see Id., p 28.)

Appellants welcome this concession. We also urge that the concession of the need to prepare an EIS studying the environmental effects of "possible accidents" involving the MX missile necessarily includes two other concessions:

1. An EIS is due on the MX.
2. Such an EIS must evaluate "worst case" situations including possible, if improbable, accidents.

B. With Respect to Non Accidental Use the Government's Brief Departs From the Record to Attack False Targets

While Plaintiffs welcome the Government's concession with respect to the need to study MX accidents, we wish it would be equally attuned to its legal obligations with respect to non-accidental use.

1. The Government's Discussion of "Worst Case" Facts Substitute Speculation for the Record

The Government in its brief substitutes lawyers' speculation and argument for scientists' facts and opinions in evaluating the worst case effects of the MX proposal in its various basing modes in the event of use. (See Brief for Appellees, pp. 31, 33-34.) Without reference to the record, the

19/ The President's report included the MX, the MX in Minuteman basing mode, and the F.E. Warren Air Force Base, Wyoming, site. (App. p. 221.)

20/ Neither the Air Force's present Notice of Intent (40 C.F.R. 1508.22 to prepare an environmental impact statement on the siting issue (48 Fed. Reg. 27123 (Jun. 13, 1983)), nor the earlier one (before the 100 MX missiles were definitely switched to Minuteman silos (48 Fed. Reg. 2166 (Jan. 18, 1983)) said that the EIS would analyze accidents concerning the MX strategic nuclear weapons system.

21/ This scope appears to be so limited as to exclude consideration of such accidents as an accidental launch or accidental exchange. Also see the restriction to "peacetime" operations in the Air Force's Notice of Intent, 48 Fed. Reg. 27123 (Jun. 13, 1983).

lawyers for the Government raise the strawperson of an alleged request by Appellants for a generalized study of the environmental effects of nuclear war ("environmental horrors of a spasm of mutual nuclear suicide" (Id., p. 31), and then proceed to ridicule the absurdity of such a general analysis.

We respectfully invite this Court's attention to the record. (MacKenzie and Scoville declarations NR. 30 and 17; generally, see: citations in Brief for Appellants, pp. 10-25 (especially pp. 19-25), 51-67 (especially pp. 63-67). The record shows that there exist occasions for judgment and for choice, the implications of which have very different meanings for the people affected. The choice of weapons systems, basing modes, and sites by the United States government significantly affects the potential for a strike against them. Id. To take an example persistently repeated in this case, if missile systems were placed at sea rather than in southeast Wyoming and the adjacent portions of Colorado and Nebraska, the target would be at sea rather than where many of Appellants' members live. (See Id. at 21-23, 63-64. This sort of choice is important to the people affected. It is the sort of impact which NEPA can illuminate. Id.

2. The Government's Discussion of "Worst Case" and the Law Relies Upon Cases Which Give It Scant Support

The Government, in its discussion of "worst case," cites Warm Springs Dam Task Force v. Gribble, 621 F.2d 1017 (9th Cir. 1980) some attention to the facts and to the procedural

history of that case is useful. The case involved one of those situations where scrutiny of the facts shows exhaustive study of the issues the Plaintiffs in that case wanted studied. Warm Springs is one of those perpetual cases that had gone up and down in the court system, from District Court to Court of Appeals to Supreme Court and back again. See partial outline in Warm Springs Dam Task Force v. Gribble, 431 F.Supp. 320, 321-322 (N.D. Cal. 1977). The concern, seismic safety of the dam, had been studied ad nauseam. (See both opinions above.) One sympathizes with the Court's saying that enough is enough. The situation lacks commonality with the present case, where the Government has refused to study the worst case at all.

In its reference to Weinberger v. Catholic Action, 454 U.S. 139 (1981), the Government attempts to scramble the two separate issues of hypothetical proposal and uncertain effects. The former situation is governed by Catholic Action. When the very fact of the existence of a proposal cannot be ascertained, there is no proposal requiring a public EIS. Quite different is the far more common situation, present in this case, where the proposal is acknowledged by all but the effects of which are uncertain. This is a more common situation, to which NEPA plainly applies. See Scientists Institute for Public Information v. Atomic Energy Commission, 481 F.2d 1079 (D.C. Cir. 1973); Sierra Club v. Sigler, 695 F.2d 957 (5th Cir.

1983);[22] 40 C.F.R. 1502.22 ("Incomplete or Unavailable Information").

3. The Government's Discussion of Procedural Barriers to "Worst Case" Is Unpersuasive

The Government's reluctance to enable this court efficiently to dispose of the issues in this case (Brief for Appellees, p. 26 et seq), supported by their Amicus (Brief of Amicus Curiae Washington Legal Foundation, p. 21 et seq.), lacks merit. The former expresses a generalized reluctance to deal with the issues of Count VII (proposal to procure, produce, and deploy the MX), while the latter asserts - erroneously - that no lower court record was developed. Id. Three points should be made:

1. As the Government properly concedes, "Because the Government moved for summary judgment on the entire case, the full record below is implicated by this appeal." (Brief for Appellees, p. 5, n.2.) By its motion for summary judgment on all seven counts, including Count VII (NR. 13), and by Appellants' opposition to the government's motion (NR. 17),

[22] Plaintiffs note that a District Court opinion cited in their principal brief, has now been the subject of an appellate decision. City of New York v. United States Department of Transportation, 539 F.Supp. 1171 (S.D.N.Y. 1982), was reversed by a 2-1 majority of a panel of the Second Circuit (2d Cir. 82-6294, Aug. 12, 1983). DOT's analysis of the risks was upheld by the Court as sufficient. Slip op., pp. 24-25. Here, of course, the agency has not studied the risk.

Count VII was placed in issue.[23] By its Motion to Dismiss, granted by the court below, the government effectively disposed of all counts, including Count VII.

2. The Government thoroughly briefed every issue necessary to disposition of the case in the court below (which included the cross motions for summary judgment and the Government's motion to dismiss (NR. 13, 19, 26; see App. pp.86, n.9).[24]

[23] Indeed, summary judgment may be awarded sua sponte. See Kennedy v. Whitehurst, 509 F.Supp. 226, 231-32 (D.D.C. 1981), aff'd, 690 F.2d 951 (D.C. Cir. 1982). See also Hoffa v. Fitzsimmons, 673 F.2d 1345, 1361-62 (D.C. Cir. 1982); Federal Food Service v. Donovan, 658 F.2d 830, 831 (D.C. Cir. 1981); Yiles v. Claytor, 481 F.Supp. 465, 469-70 (D.D.C. 1979), cf. Sibley Memorial Hospital v. Wilson, 488 F.2d 1338, 1343-44 (D.C. Cir. 1973).

[24] The Government's papers below include Statements of Points and Authorities in Support of Defendants' Motion to Dismiss (NR. 13), discussing, inter alia, mootness (p. 11 et seq.), standing (p. 15 et seq.), and political question (p. 24 et seq. and Reply Memorandum in Support of Defendants' Motion to Dismiss (NR. 25 discussing mootness (p. 5 et seq.), standing (p. 8 et seq.), and political question (p. 18 et seq.). Generally see the Government's motion for summary judgment and accompanying points and authorities and declarations. (NR. 26.). Pertinent papers submitted by Appellants below include Plaintiffs' Statement of Points and Authorities in Opposition to Defendants Motion to Dismiss (NR. 17), discussing mootness (p. 5 et seq.), standing (p. 14 et seq.), and political question (p. 26 et seq.); Plaintiffs' Response to Memorandum of Amicus Curiae Washington Legal Foundation (NR. 21) discussing inter alia, standing (p. 6, n.6.); Third Declaration of Stephen M. Wheeler (NR. 30), regarding standing; Declaration of Sister Frances Hussey (NR. 30), regarding standing; Plaintiffs' Response to Reply Memorandum in Support of Defendants' Motion to Dismiss (NR. 32), discussing, inter alia, standing (p. 1 et seq.); Plaintiffs' Reply Memorandum to Defendants' Motion for Summary Judgment (NR. 37), discussing, inter alia, standing (p. 23 et seq.).

1. While appreciative of the Government's solicitude for the adequacy of Plaintiffs' opportunity fully to develop their case as to Count VII (Brief for Appellees, p. 27), as we have emphasized, Plaintiffs believe both the facts[25] and the law[26] clearly require the preparation of an EIS on the MX proposal.

The Washington Legal Foundation (WLF)[27] amicus brief says that Plaintiffs devote attention to Count VII, but had not emphasized it below. WLF Amicus Brief, p. 21. The short answer is that we give greater emphasis to Count VII now because the court below by its ruling disposed of it.

Similarly, the government questions with apparent bewilderment why, given Plaintiffs' agreement that the Dense Pack or Closely Spaced Basing (CSB) mode is moot in fact, the same logic does not apply to the MX proposal.[28] Brief for the Appellees, p. 12. The answer, of course, is simple - CSB is in fact moot, but the MX proposal is not moot in fact and never has been. Everybody concerned has in fact dropped the Dense Pack (CSB basing mode proposal - the Air Force, the Defense Department, influential members of Congress, the President, and his advisers. The MX proposal, on the other hand, has not been dropped. It remains alive, as it has been for over a decade.

[25] Brief for Appellants pp. 20-25 (note p. 19, n.11), 66-67; Reply Brief for Appellants, pp. 3-17, supra.

[26] Quite simply, the request for authorization for the MX as distinguished from a request for appropriations, Andrus v. Sierra Club, supra, 442 U.S. 347, 359 n.18 (1979), is clearly a "proposal for legislation" within the meaning of §102(2)(C) of NEPA, which requires an EIS. See also 40 C.F.R. §§1502.3, 1506.8, 1508.17. See discussion at pp. 9-11 of this brief.

[27] WLF also makes reference to a proposal for guidance on worst case placed in the Federal Register for comment. WLF Amicus Brief, p. 23. We must emphasize that: 1) the entry is proposed for comment only and does not represent a final view of CEQ, and (2) in any event no change to the worst case regulations is proposed or suggested.

CONCLUSION

We conclude as we did before, asking this Court not to allow the Government to avoid the procedures required by Congress in the National Environmental Policy Act. At stake is the application of those procedures to the MX missile system. Procedures, we again stress, may be said to be what make a system of ordered liberty work. Plaintiffs here seek not to overturn decisions best left to coordinate branches of government, but rather seek to insure that the Executive Branch follows the procedures the Legislative Branch has prescribed. In that way the public will be involved in the decisionmaking, the relevant information will be widely available, and consideration of the environmental impacts -

[28] The Government also mischaracterizes Appellants brief (page 6) by ascribing to it a statement that the President's decision was a subsequent development which rendered Dense Pack (CSB) moot in fact. (Brief for Appellees, p. 12.) Plaintiffs' statement was considerably broader - that the Dense Pack basing mode had been "universally rejected" (i.e., influential members of Congress, the Appellees, the President, the public).

including the most potentially severe ones - will assume their proper place in Executive, Legislative, and public debate and decision.

Respectfully submitted,

August 24, 1983

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TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-439

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-458

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-347

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COMMENTS PRESENTED AT E.I.S. PUBLIC HEARING

By:

Tim Daly, Director
Community Action of Laramie Co.
Member, Coping Mechanism Sub-Committee
of Mayor Erickson's Impact Team

We have several areas of concern in the area of social services.

Our first concern is the fact that the Air Force has underestimated the potential for impact to social services. When projecting impact on social services, only population increase estimates have been examined. The study did not take into account the fact that levels of impact to social services often occur at a rate that is faster and higher than the actual percentage of population increase.

557 These kinds of problems are the problems that result from the stress placed on the community due to a sudden increase in population.

The possibility and probability of new problems occurring and of disproportionate increases of current problems must be addressed in order for the E.I.S. to be accurate.

Another problem that has been underestimated is the problem of transients coming to Cheyenne looking for work on the project. The Air Force has also shrugged this problem off, citing other projects of similar size; saying that, since these projects did not have significant transient problems, the MX Project will not either. This project, however, due to the nationwide publicity and controversy it has generated, 578 does not fit into the average mold. People from Florida to California know that a large military project is being built in Cheyenne, and, with the national unemployment rate at its current level, unemployed persons are bound to find Cheyenne an attractive magnet.

This is a problem that is already occurring, and must be dealt with, because, by simply closing our eyes, these people will not go away. Many times they have sold all they have to leave.

Underlying all of these problems is the fact that the community is going to need timely, up-front money to deal with them. Although Cheyenne may receive economic benefits from this project, the money that will come from the increased economy will come too late to 89 provide assistance to such areas as housing, police protection, social services, and others. Since the federal government is the cause of the impact to these areas, adequate money must be furnished in a timely manner to prevent problems in these areas.

E.I.S. Comments
Tim Daly
Page 2

The statement has been made by the Air Force and its consultants that money has been provided, and that it is up to the City to determine its priorities. Cheyenne should not have to decide which of its services should be maintained and which should be allowed to fall behind. All of the aspects of our quality of life should be allowed to prosper. We should not have to choose between streets & Alleys and 89 Police Protection or between Education and Social Services.

Cheyenne is in the unique position of being able to prevent some of the problems that have occurred in other impacted communities. We must, however, have accurate information and good cooperation from the Air Force in order to do so. Due to the inaccuracies of the information the Air Force has completed so far, this is not happening.

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-349

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Scotts Bluff County Domestic Violence Task Force
P.O. Box 434
Scottsbluff, NE 69361

436-HELP (436-4357) Hot Line

632-DOVE (632-3683) Office

Major Peter Walsh
Environmental Planning Division
Department of Air Force
AFRCE - BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

The proposed deployment of the MX missiles in Nebraska and Wyoming is a source of concern for the Scottsbluff County Domestic Violence Task Force. The Social Well-Being section of the Draft Environmental Impact Statement has identified an increase in family violence as a potential side effect of the missile construction (page 3-87, paragraph 1). We would like to add that research on boom towns has documented that this increase in domestic violence is more than a potential side effect - it is almost a certainty. The DEIS continues by stating, "The lack of available resources for dealing with social problems such as these and the potential difficulties of adjustment that may be experienced by families as a result are judged moderate* (the area has previously experienced changes similar to those assessed, but related public and private resources and responses are not adequate to deal with the changes) and significant (population subgroups are not able to adjust or assimilate through existing institutional and informal social structures.)"

As a mitigative measure to cope with the increase in domestic violence the DEIS suggests, "Creation of an educational program dealing with the problems of family violence and the support of existing services to deal with this problem." (page 3-90, paragraph 5) The parties responsible for instituting these measures are "public agencies/subsidies, private volunteer groups." The parties responsible to pay for this are not identified. Since the Scotts Bluff County Domestic Violence Task Force is presently serving Kimball and Cheyenne Counties, it is obvious that dealing with this increase in abuse will fall to our Task Force also.

Our Task Force is presently overextended in attempting to meet the needs of our community in relation to domestic violence. Paid staff and volunteers alike are exhausted from the effort involved in providing support, shelter, and counseling to victims of domestic abuse 24 hours a day, seven days a week. We desperately need money to increase our staff hours now. If, indeed, the MX construction goes through, our meager resources - financial and human - will be quickly depleted and it is difficult for us to comprehend how we will be able

Domestic Violence Emergency Service

*Please note that this is an extreme misnomer since moderate usually means within reasonable limits and the DEIS uses it to mean unmanageable.

Scotts Bluff County Domestic Violence Task Force
P.O. Box 434
Scottsbluff, NE 69361

436-HELP (436-4357) Hot Line

632-DOVE (632-3683) Office

to continue to provide this vital service to the Nebraska Panhandle. As the DEIS itself states, the present resources will, indeed, not be able to meet the needs of victims of abuse.

We, at the Task Force, however, believe that continuing to provide services to abused spouses is of paramount importance. We would like to know precisely how the Air Force intends to assist us in dealing with the problem that MX construction will create for us. Further, we want a financial commitment from the Air Force to allow us to continue to serve all victims of abuse within our present service area throughout the duration of the construction project.

Specifically, we would like the following areas addressed:

I. STAFF. We presently have one full time paid staff member and two part time paid staff. Both of the part time positions would need to be increased to full time. Further, an increase in clients would necessitate at least the following paid staff positions in addition.

A. An Executive Director
B. A staff to deal with the needs of the children of our clients

II. A RESPONSE TO THE PROBABLE INCREASE IN SEXUAL ASSAULT. Presently, crisis services and ongoing support for victims of sexual assault in the Panhandle are nonexistant. The above mentioned boom town research also indicates that construction of the MX will lead to an increase in sexual assault. It is the Air Force's responsibility to provide the financial backing to help us meet the needs of these victims.

III. MANDATORY COUNSELING FOR THE ABUSERS. We have long recognized that helping the victims of abuse is only a band-aid. A full time, paid coordinator is needed to implement a counseling program for the spouse who abuses.

IV. ADDITIONAL FACILITY. Our present shelter has limited space and we are sometimes forced to resort to housing clients in motels. If our caseload increases, we will need more shelter space and support for all of the incidentals (utilities, consumables, etc.) associated with that.

V. SUPPORT FOR RECRUITING AND TRAINING VOLUNTEERS. This is a difficult and expensive task already. We would expect the Air Force to provide direct financial support for training as well as additional staff to recruit, train, and organize volunteers.

VI. INCREASED TRANSPORTATION COSTS. Transporting clients from Kimball and Cheyenne Counties is expensive. We would expect the Air Force to provide funds to cover the increases here.

DOmestic Violence Emergency Services

Scotts Bluff County Domestic Violence Task Force
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Scottsbluff, NE 69361

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VII. MISCELLANEOUS. We will also need financial assistance with the increased costs of long distance telephone calls; providing food, clothing, and personal supplies (diapers, toothpaste and brushes, soap, etc.) to clients; providing for increased office expenses (postage, stationary, etc.); increased use of utilities.

Although responsibility for responding to the increase in domestic violence will obviously fall to our Task Force, we have some fears about whether or not the Air Force will uphold their responsibilty in helping us respond to the increased domestic violence. Our fears stem from the fact that neither the cities of Scottsbluff/Gering, nor Scotts Bluff County were included in the detailed studies of the DEIS. The Air Force rationale was that our population increase would be less that 5%. This is faulty reasoning since the services that we provide will be seriously impacted even though the population increase will be in Kimball and Cheyenne Counties. The DEIS itself recognized this in Section 3.1.5.4.2.2, stating, "The absence of most human services in the county is an indication that people must travel for most services or do without certain ones." (page 3-87, paragraph 3).

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Therefore, we feel that it is extremely important that a detailed DEIS be carried out in Scotts Bluff County so that we will have the necessary documentation to request assistance with MX related problems that do impact Scotts Bluff County and the cities of Scottsbluff and Gering. Further, we would like an assurance from the Air Force that they will, indeed, meet their responsibility in helping us to assist the victims of the increased domestic violence that will result from the deployment of the MX.

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Your attention and assistance are appreciated. We expect a reply.

Sincerely,

Betsi Barresh

DOmestic Violence Emergency Services

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LARAMIE COUNTY CITIZENS FOR MENTAL HEALTH, INC.

Community Center on Domestic Violence | P.O. Box 1621 Cheyenne, Wyoming 82003 634-8655 | Grandma's Safe House

TO: State Planning Coordinator's Office
2320 Capitol Avenue
Cheyenne, Wyoming 82001

FROM: Jeanie Sedgely
Executive Director
Grandma's Safe House
Community Center on Domestic Violence

RE: Air Force Impact Study

DATE: October 12, 1983

I would like to address a number of inaccuracies, as well as additions, regarding the report on Grandma's Safe House and the Community Center on Domestic Violence (Section 3.10.1.4.8 to 3.10.1.4.8.3).

On page 3-295, first paragraph:

732 - our FY 1984 budget totals $149,754.

- our staff consists of five direct service providers (one part-time), one administrative director, and one part-time secretary.

708 - Over 7,400 volunteer hours have been donated since the program became operational. At $4.00 per hour, this represents community support in the amount of $29,600.

Second paragraph:

- our capacity is 9 to 15 residents, depending on number of children and infants.

- our remodeling plans for the basement (estimated at $15,000) will add four bedrooms to the Safe House.

717 - the Safe House is filled to capacity about 50% of the time. However, we are required by the State to be accessible 24 hours a day, 7 days a week to all eligible clients, whether or not we are full. Consequently, we are sometimes filled beyond our capacity. We then house clients in nearby motels. Thus our existing space is not always adequate for current needs.

- we also provide housing for male victims of family violence (motels).

717 - in order to double our capacity we would need to double our food budget($4,000) and our utilities ($3,500), as well as increase our staff positions by 1½.

Fourth paragraph (In 1981,...):

720 - 32% of the abusers (not residents, were unemployed.

- since 43% of our residents are partners of active military or the unemployed, we anticipate a disproportionate increase in the need for our services.

If I can provide you with any additional information regarding our program or needs, please don't hesitate to call.

MX 264
Information Center
232½ University Street
Salt Lake City, Utah 84102
(801) 581-9027

Lt. Col. Peter Walsh, Director
Environmental Planning Division(DEV)
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, CA 92409

November 25, 1983

Dear Lt. Col.Walsh:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed deployment of MX (Peacekeeper missiles in Minuteman silos. These comments are submitted by the MX Information Coalition and by Western Solidarity, and represent only a few of the concerns of members of these two organizations about the MX basing plan addressed in the DEIS.

23 Within the past ten days, you received a request from the MX Information Coalition for an extension of the DEIS comment period of thirty days and for public hearings in three Utah communities on the proposed deployment. In your response of November 23, you made several statements which we would like to address as part of our review of the conduct of the Air Force relative to the NEPA review process. You state that the Air Force cannot extend the comment deadline because it would not allow sufficient time for the Air Force to respond to public comments by the January 31, 1984 FEIS publication schedule established by Congress. To our knowledge, Congress did not mandate deadlines for scoping hearings, DEIS hearings, or the end of the DEIS public comment period, and that these schedules were established by the Air Force. It is worth noting that the 45-day public comment period is the least that the law will allow, and that the Air Force has structured the timetables so that the Air Force will have 64 days to respond to comments made in less than 45 days by the people.

18 Regarding your assertion that the public has been given sufficient notice of events throughout the EIS process, it hardly seems likely that the city council of Pine Bluffs, Wyoming would be completely unaware of a scoping hearing in their own city if "sufficient notice" were given citizens of that community. Publishing notice of hearings in the Federal Register may be legally sufficient, but it is a meager effort toward informing the public. We would like to see published in the FEIS copies of all notice made by the Air Force of all scoping and DEIS hearings, and the local, regional and national media which received and distributed or broadcast such notice. We would also like 12 to point out that the schedule for the notice and for the holding of these hearings was as tight as the law and the logistics would permit. Seven scoping hearings in five days and seven DEISheárings in four 19 days, both with just two weeks warning, were all that local residents were given to digest and respond to a project of immense significance, impact, and expense. Moreover, the hearings were held at times which 19 were not convenient and conducive to public participation, and the conduct of these hearings has been widely criticized by many of those in attendance. The Air Force has not encouraged or facilitated public education or participation in this process, but has deliberately done as little as necessary to comply with NEPA regulations.

Your reply to our request for hearings in Utah was predictable but was not justified. "The Air Force decided to conduct local public hearings on the (MX) draft EIS only in the five counties...where construction or deployment will occur." When, by whom, and on what basis was this decision made? What criteria were used in this narrowing process? Was the public provided an opportunity to participate in this decision? How did the Air Force arrive at its definition 53 of MX "construction"? And what is that definition? Certainly, the MX is being constructed in Utah, Colorado, Texas, and other locations far from F.E. Warren AFB. On what grounds did the Air Force refuse to "analyse the impacts of implementing actions (of the President's MX proposal) and their alternatives, including the development of mitigation measures" in regions where the MX is now being constructed? We request that answers to each of these questions be included in the FEIS.

A comprehensive and thorough FEIS should include analysis of and mitigation measures for impacts created by all implementing actions of the proposed MX deployment. This EIS should address the social and economic impacts incurred in communities where components of the MX system are manufactured. How does MX production affect employment in these communities? What will be the impact on employment when MX production is completed or the program terminated? What are the dangers to the public, including possible accidents, in the transportation of MX components from point of manufacture to Warren AFB? The FEIS should identify all communities near production facilities, storage facilities, and transportation routes that would handle MX related nuclear material and fuels, as well as MX related waste products.

62 The FEIS should also address the effects of MX related atomic explosions at the Nevada Test Site upon the environment and the health of nearby residents in the event of a radiation venting, since testing of MX warheads is an implementing action of MX deployment.

183 The DEIS does not address Air Force plans for the MX system once it has concluded its operational life. What remedial actions are planned for the decommissioning of MX missiles and their silos? What are the plans for those Minuteman missiles which are to be replaced by MX missiles? Will Minuteman missiles be transported to Hill AFB in 45 Utah for storage? What will the impact of this action be, and what mitigation measures will be employed?

A further comment about process: why was public access to the technical reports (technical support data) for the DEIS so severly restricted? The technical reports should have been made available in a convenient 24 fashion to all parties interested in reviewing and commenting on the MX basing proposal, as they were in the previous MX EIS for MPS basing in Utah and Nevada. Lack of access to this data for persons and groups unable to visit Wyoming and Nebraska state libraries made accurate

24 and detailed analysis of the DEIS extremely difficult.

The DEIS admits the possibility of accidents in the transportation, construction, and operation of the MX in Minuteman silos (see sections 1.6.10.2-4), yet blithely brushes off these possibilities as remote, and fails to assess the impacts that accidents could inflict upon the natural and human environment. While it is understandable that not all potentialities can be projected and addressed, the effects of accidents are virtually ignored in the DEIS. This constitutes a serious omission. It is simply not adequate to state that the Minuteman system has worked so far with no serious accidents, and therefore it can be assumed that the MX system will perform in the same manner. Witness the serious accident which occurred in a 163 silo based Titan missile in Arkansas.

Nowhere in the DEIS is the impact of use of the MX system addressed. Despite the Air Force assertion that the MX in Minuteman silos is 37 designed for deterrence, the MX system is designed to be used in the event such use becomes necessary. The impact of system use should 153 be addressed in the FEIS. Given the fact that flight tests of other new generation nuclear weapons (such as Pershing II missiles and 37 Ground Launced Cruise Missiles) have had a less than perfect performance record, the impact of malfunctions of MX missiles during use should also be analysed. The impacts upon the atmosphere and worldwide climate, and the effects of radioactive fallout from use of the MX must also be addressed, for these effects will not only be felt in the MX target areas, but world-wide, including the MX deployment region.

The DEIS briefly mentions the Jackson Amendment to the 1983 Defense Appropriations Act, stating that this amendment exempts the President's MX deployment decision from NEPA requirements. Since the entire nation enjoys environmental protection under NEPA, the implications of the Jackson Amendment for future U.S. environmental policy and 79 programs should be addressed as part of the environmental impact assessment document for the program made possible by the Act. The complete FEIS should cite criteria used for the MX exception, and identify the potential impacts of programs, policies and NEPA protection itself if similar NEPA exceptions may be granted in the future.

The alternatives to the proposed MX basing are too narrow. In the past five years, at least half a dozen MX deployment schemes have been proposed, and varying numbers of missiles to be deployed have 76 been suggested. The DEIS fails to offer comparisons of impacts between MX in Minuteman silos and other basing plans which are under consideration, have been introduced in the past, or are likely to be proposed in the future. Such comparisons should be offered in the FEIS.

This concludes our general, not all-inclusive criticism of the EIS process to date and the DEIS document. What follows is a critique of the more specific elements and sections of the DEIS.

GEOLOGIC RESOURCES

1471 Launch facilities are located on or near the Wheatland-Whalen "potentially active" fault zone (1-30) (ref. section 2.2.3.2.1.2). The DEIS states that the possibility of ground rupture or sufficient ground motion to cause an explosive detonation is extremely remote, since the magnitude of recent earthquakes in the area have been small (M_L = 3-3.5). However, the possibility of larger and more destructive earthquakes does exist. There is no estimate of earthquake magnitude that a silo could withstand, but any major movement directly along the fault itself (regardless of magnitude) may cause considerable structural damage to a silo located there. For example, the recent earthquake in Challis, Idaho (October 1983) (M_L = 6.7) caused about 3 meters of displacement along a pre-existing fault. The area had been relatively quiet, with small earthquakes recorded. The fault had been all but ignored due to the lack of major seismic activity, with the last major movement estimated to have occurred several hundred years ago. With this recent earthquake, it was necessary to shut down nuclear reactors within a 50-mile radius of the earthquake area. The potential for a sizeable earthquake along the existing Wheatland-Whalen Fault Zone likewise exists, and should not be easily dismissed as "remote". The FEIS should re-examine the rationale behind MX deployment in silos on or near the fault, and an analysis of the impact and proposed mitigation measures necessary in the event of a major earthquake along this fault should be included.

1331 Possibilities of ground subsidence in the deployment region due to increased ground water mining is inadequately addressed in the DEIS.

Revegetation of disturbed areas is often less than successful. Erosion will be a more sizeable problem than predicted in the DEIS.

1460 WATER RESOURCES

Methodology:

Hydrology is a very quantitative science, and the way in which this section of the DEIS is written makes verification of projections almost impossible. Units are inconsistent or uninformative, as mentioned below. The only reference to methodology is for methods used to determine surface water flow projections. These methods are the best available, but are unavoidably subject to a healthy margin of error. Where groundwater is concerned, the report states only that "various analytical techniques (3-219)" and equations of groundwater flow for typical aquifer parameters were used. We would like to know just what those methods and parameters are. Again, with the lack of access to the 12 companion environmental planning technical reports, it is difficult to assess the adequacy of DEIS projections and analyses.

1299 Water Supply:

1326 Deployment would affect both quality and quantity of water in the Ogallala aquifer. This is much more significant than it seems, since this aquifer is the major water source for the high plains. It stretches through 8 states from South Dakota to central Texas, and depletion of the aquifer is a serious concern. All of the states using Ogallala water depend almost solely on this source for irrigation, and it is being very rapidly depleted. It has a very low natural recharge rate since it has been geologically cut off from its historic recharge source. Yet, further lowering of this aquifer is considered "short-term" and "not significant" (3-220). Possible radiation leaks into the aquifer and attending contamination of this water supply would be disastrous. The DEIS projects an increase in dissolved solids and nitrates 1335 in the groundwater downstream of Cheyenne due to increased wastewater discharges,
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1330

but it never states how much or how Wyoming law will be complied with in this concern. The law prohibits any impact on groundwater quality.

The Cheyenne water wellfields use principally the Dakota aquifer water. Water supplies in all communities affect by deployment except Cheyenne is from wells. Cheyenne wellfields in current use have already reduced or eliminated baseflow (continuous year-round flow) in some areas.

1301

Table 3.2.1-1 (3-222), projecting water demands for Cheyenne, assumes that groundwater pumpage will be reduced to 2500 acre-feet per year. AF/yr. yet production capacities of thewells in the future are unknown. It assumes that irrigation uses will remain constant, which is unlikely. Net import excludes evaporation and spillage losses, which are quite significant. The projected increase in the Douglas Creek from 2300 AF yr in 1983 to 12,400 AF yr in 1986 is not convincing. Even with this projected increase, supply falls seriously short of demand at least until 1985. This is too much of a shortfall to be met by increased groundwater mining.

1334

The Environmental Consequences section addresses in detail only the Cow Creek watershed. All other areas that would be affected need to be examined more closely. In particular, impacts of groundwater pumping, especially in Platte, Goshen, Laramie, Banner, and Kimball and Scottsbluff Counties, where demands will increase by more than 100,000 AF yr, need to be looked at more closely. We are not convinced that this water is available.

1342

Mixing of AF/yr data with gallons per capita day (gpcd) data with no direct mention of population numbers or industrial growth make further examination of water demand impossible without accompanying data. Projected water requirements for the project itself are also difficult to verify without data showing how they were calculated. Lastly, "adjudicated and unadjudicated water rights" in Wyoming exceed actual water use and water availability (2-98). In Nebraska, water rights are supposedly available but not yet secured.

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Water Quality:

Sediment, primarily from roads, construction, and agriculture, is the number one water pollutant in the U.S. This has a major impact on fisheries as well as on primary water.

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The DEIS reports erosion rates in Tons/year/?yr., a meaningless unit. Erosion rates should be reported in Tons/acre/year, or better yet, in parts per million (ppm), where sediment into streams is concerned. Otherwise, no meaningful assessment of magnitude can be made. There is not enough information in the statement to convert most of the reported values, especially expected increases, to meaningful numbers.

In estimating present erosion rates, the DEIS assumes representative erosion rates (3-230). This is definitely not applicable to the Great Plains region, where wind and water erosion is notoriously the worst in the country. Even the soil's section of the report (3-222) gives estimates of erosion rates that are almost twice as high.

1317

Lodgepole Creek reservoirs, Flover and Bennet, already have sedimentation problems. Three launch control facilities and 33 launch facilities are to be located in this watershed. The impact on sedimentation will certainly be greater than an increase of 16% to 19% described as "low and not significant" (3-232), regardless of mitigation procedures. The same is true for Horse and Pumpkin Creeks reservoirs. It is apparent that there needs to be a lot more quantitative work and a lot less guesswork on the erosion problem.

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This situation can only aggravate the already serious quality problems with Cheyenne's present wastewater discharge downstream, especially since "no change in controls on water use or water quality protection are forecast..." (3-224).

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OTHER RESOURCES

What follows are general comments and summaries of DEIS analysis of other sections. Problems with all of the following section is that little or no fieldwork was done to analyse affected environments, environmental consequences, and unavoidable impacts. Reliance on available literature and agency contact is not enough.

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Vegetation

Any disturbance to riparian vegetation will have a corresponding effect on stream quality and temperature, affecting fish habitat.

1433

Masked under the rather qualitative impact designations "low to high, significant or not significant" is the probability that Laramie false sagebrush (a federally proposed endangered species) and the Colorado Butterfly plant (a listed endangered species) will be impacted. The same is tru for Hayden's penstemon (species of concern), the Northpark phacelia, and the wooly milkvetch (rare plant species that is located on a silo site). How will the laws be complied with?

Big Game

There will definitely be, as stated, a "significant" impact in Flight 1, where there is identified elk habitat, a pronghorn migration route, and critical winter and year-long habitat for mule deer.

Non-Game

The meadow jumping mouse (Wyoming rare mammal species) occurs within the Area of Concentrated Study.

The two major areas of high quality waterfowl habitat within the Area of Concentrated Study are within Flight 5.

1429

The DEIS admits that the proposed action may result in a loss of individuals of several types that are unable to move from construction areas, including the Dale Hollow snake (special state status in Wyoming and Colorado). They do not elaborate on this enough by species.

1430

The black-footed ferret is a federal endangered species. It is quite probable that they may be found in this area, as they are associated with prairie dog towns. There needs to be some real work done to determine presence or non-presence.

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There will be disturbance to nesting raptors. Nineteen raptor nests are located within one mile of access roads or silos. These raptors include the Swainson's hawk, burrowing owl, and ferruginous hawk. Bald eagles, peregrine falcons, and whooping cranes migrate through the area. Again, this needs more quantitative work.

Fisheries

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It is highly unlikely that aquatic resources will not be impacted by direct construction activities (3-242). Interference with riparian vegetation and erosion problems will probably both severely impact the already limited fisheries resource. The reason that this resource is limited to begin with is that it has already been impacted by water quality and quantity problems. The DEIS mentions the possibility of petroleum product and

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chemical spills (3-243). Apparently, all roads will "minimize" drainages, which is not good news for fisheries and fish habitat. Also, any "gravel" removal from perennial streambeds is proposed, which will most definite have an impact.

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This concludes this set of comments on the MX in Minuteman Silos Draft Environmental Impact Statement. We would like to request that the MX Information Coalition receive three copies of the Final Environmental Impact Statement. We further request that all DEIS comments submitted by groups or individuals be included in the FEIS. We hope that these comments will be addressed fully in the FEIS, and we hope that our comments will prove useful. Thank you again for the opportunity to comment.

Submitted by:

Stephen Erickson
Chair, MX Information Coalition DEIS Review Committee
Executive Committee, Western Solidarity

MX
Information Center
232 S University Street
Salt Lake City, Utah 84102
(801) 581-9027

November 15, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept. of Air Force
AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

The MX Information Coalition hereby requests a 30-day extension of the deadline for written comments on the Draft Environmental Impact Statement for Peacekeeper (MX) In Minuteman Silos. The current 45-day comment period ending November 28, 1983 is insufficient to allow for a careful and thorough review of the MX DEIS document, particularly in light of the fact that the document was released with little notice to the public, making it difficult for individuals and organizations interested in reviewing and commenting on the DEIS to obtain copies of the document in a timely fashion. Whereas adequate time and opportunity for the public to review and comment on the DEIS is required by the National Environmental Policy Act (NEPA), and whereas a 30-day extension of the comment period will not substantially affect Air Force timetables, we believe our request for an extension is appropriate and justified, and should be granted by the Air Force.

The MX Information Coalition also requests that public hearings on the MX DEIS be held by the Air Force in Salt Lake City, Ogden, and Brigham City Utah. Though the 1983 Defense Appropriations Act has exempted the proposed basing of MX in Minuteman silos from NEPA requirements, and therefore the Air Force has no legal obligation to conduct hearings in communities affected by the MX decision, it is our strong contention that the public has a right to know how this decision will impact their communities, and that the Air Force, as a publicly funded agency, has a moral obligation to inform the public of MX impacts and Air Force impact mitigation plans. Utah communities will feel the impact of the proposed MX deployment.

regardless of the ommission of MX impact analysis on affected Utah communities in the DEIS. Major components of the MX missile system are produced in or near Salt Lake City and Brigham City, and must be transported to F.E. Warren AFB for deployment. Hill AFB near Ogden, Utah will serve as the support facility for the 90th Strategic Missile Wing at Warren AFB. Environmental and socio-economic impacts generated by the MX have already been felt in these communities, and will continue to be felt in the future. The failure of the Air Force to address these impacts in the DEIS and through public hearings in affected communities represents a disturbing lack of thoroughness in the environmental analysis and a callous disregard for the concerns of the public. This oversight and questionnable judgement can and should be redressed by the Air Force.

We ask your prompt consideration of and reply to our requests.

Sincerely,

Mary Denslow-Smith, Co-Chair
MX Information Coalition

Patricia Sexton, Co-Chair
MX Information Coalition

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, BALLISTIC MISSILE SUPPORT AGENCY
NORTON AIR FORCE BASE, CALIFORNIA 92409

23 November 1983

Ms Denslow-Smith & Ms Sexton
MX Information Center
232 ½ University Street
Salt Lake City UT 84102

Dear Ms Denslow-Smith & Ms Sexton

This is in response to your November 15, 1983, letter concerning the draft Environmental Impact Statement (EIS) for Peacekeeper in Minuteman silos. As stated in the cover letter to each draft EIS, the public comment period will end on November 28, 1983, and will not be extended. The schedule established by Congress in the 1984 Defense Authorization Act requires publication of the final EIS by January 31, 1984. Extending the public comment period until the end of December would leave insufficient time to prepare a final EIS responsive to public comments by January 31.

The draft EIS for Peacekeeper in Minuteman silos was released with sufficient notice to the public. A notice of intent to prepare an EIS was published in the Federal Register on June 13, 1983, and scoping meetings were conducted in June and July 1983. Notice of the draft EIS availability was published in the Federal Register on October 14, 1983. On that date, the document was available at libraries and to federal, state and local agencies within the study area. News releases and press conferences were held in advance to increase public awareness of the availability of the draft EIS. The draft EIS was also sent to individuals who submitted written comments during the scoping process and to many public interest groups and organizations, including the MX Information Coalition.

Public hearings will not be held by the Air Force in Salt Lake City, Ogden or Brigham City, Utah. The Air Force decided to conduct local public hearings on the Peacekeeper draft EIS only in the five counties of Wyoming and Nebraska where construction or deployment activities will occur. The opportunity to submit written comments, however, is available to everyone.

Along with other comments on the draft EIS, your November 15, 1983, letter will become part of the final EIS. The final EIS will be responsive to comments received during the public comment period. We appreciate your interest in our environmental impact statement process and the Peacekeeper program.

Sincerely

PETER WALSH, Lt Col, USAF
Director
Environmental Planning Division

265

MX
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232 ½ University Street
Salt Lake City, Utah 84102
(801) 581-9027

November 15 1983

Major Peter Walsh Director
Environmental Planning Division DEV
Dept. of Air Force
AFRCE-BMD
Norton Air Force Base CA 92409

Dear Major Walsh

The MX Information Coalition hereby requests a 30-day extension of the deadline for written comments on the Draft Environmental Impact Statement for Peacekeeper (MX) In Minuteman Silos. The current 45-day comment period ending November 28, 1983 is insufficient to allow for a careful and thorough review of the MX DEIS document, particularly in light of the fact that the document was released with little notice to the public, making it difficult for individuals and organizations interested in reviewing and commenting on the DEIS to obtain copies of the document in a timely fashion. Whereas adequate time and opportunity for the public to review and comment on the DEIS is required by the National Environmental Policy Act (NEPA), and whereas a 30-day extension of the comment period will not substantially affect Air Force timetables, we believe our request for an extension is appropriate and justified, and should be granted by the Air Force.

23

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21

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We ask your prompt consideration of and reply to our requests.

Sincerely,

Mary Denslow-Smith, Co-Chair
MX Information Coalition

Patricia Sexton, Co-Chair
MX Information Coalition

266

MOUNTAIN WEST ENVIRONMENTAL SERVICES

P.O. BOX 1471
CHEYENNE, WYOMING 82003
(307) 634-6386

November 10, 1983

Major Peter Walsh
AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Major Walsh:

We have the following comments on the "Peacekeeper in Minuteman Silos" draft EIS.

1420 (1) Figures 1.6.2-2 through 4 on pages 1-17 through 19 are not clear regarding the "design option" designation. This has an important bearing on the impact on the Colorado butterfly plant, a candidate endangered species. All three alternatives, as reflected in statements on pages 5-18 and 3-253, would appear to be in violation of the Endangered Species Act. A clarification should be provided that is consistent with the Act.

427 (2) The rare Swift fox that occurs on Warren AFB is not mentioned in Section 2.2.2.2.5.2. Impacts on this species should be addressed and mitigations proposed if needed.

468 (3) If my memory is correct, within the last 2 years there was an earthquake about 10 miles west of Cheyenne with a magnitude of about 4. This should be added along with an analysis to Section 2.2.3.2.1.1 and other appropriate sections.

481 (4) No mention is made under Section 2.2.4 of the noise created by Air Force helicopters. They frequently rattle windows and generally are a nuisance at times. Will there be an increase in their use? Are there ways to minimize their disturbances?

012 (5) A commitment should be made on mitigating measures rather than just listing them as possible.

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Sincerely,

Robert D. Doro
President

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The Nature Conservancy

November 10, 1983

James F. Boatright
Deputy Assistant Secretary of the Air Force
AFRCE-BMS/DEV
Norton AFB, California 92409

Dear Sir:

Thank you for the copy of the Draft Environmental Impact Statement for Peacekeeper in Minuteman silos and the associated Draft Environmental Planning Technical Report-Biological Resources. We would like to make the following comments regarding endangered species.

1420 On page 3-244 you state that the impact on the habitat of the Colorado Butterfly Plant, Gaura neomexicana coloradensis will be short and long term, *significant and high with the Proposed Action, R-2. All road construction* plans, (alternatives R-1, R-2 and R-3) will affect the habitat of this plant. Alternative R1 would cause the least additional damage to this species. As your Planning Technical reports (P. 3-72) a southern access design option using existing roadways would result in minimal impact to the species. We urge you to use a southern access design which would have minimal impact on the species.

1440 We would also urge that you include specific mitigation, recovery and monitoring programs for the Colorado Butterfly Plant if the Proposed Action, R-2 is selected. This would be consistent with the intent of Congress as defined in the Endangered Species Act (as ammended) and continue to honor the spirit of the Memorandum of Understanding between F.E. Warren AFB and the U.S. *Fish and Wildlife Service's Office of Endangered Species (see p. 5-18, DEIS).* Such mitigation would include, but not be limited to, the following:

1) those road construction techniques described in 3-252 (DEIS) to minimize impacts to the habitat of the species;
2) collection of intact plants in areas where destruction of the riparian community is unavoidable and greenhouse propogation of the plants;
3) greenhouse study of the optimal water-soil regime for the species,
4) Field studies of the micro-hydrology of the Crow Creek, Diamond Creek and the unnamed drainage at Cheyenne Road at Parade Drive,
5) application of the results of the greenhouse water-soil studies and hydrological studies to the engineering planning for road construction;
6) continued green house propogation of the species, either from the *plants collected previous to construction or existing seed sources,*
7) identification of protected sites on F.E. Warren AFB (or elsewhere) for propogation of the species,
8) active planting and cultivation of the species on suitable reconstructed habitat following Peacekeeper construction.



James F. Boatright (2)

1440

9) annual monitoring of all undisturbed and reconstructed populations,
10) development of a contigency recovery plan for the eventuality that the *Proposed Action results in monitoring data showing significant* decreases in the populations of the species on F.E. Warren AFB. The natural distribution of the plant (previous to extensive disruptive practices by man) suggests that extensive habitat remains elsewhere in the Region of influence but that reintroduction of the species and management of these sites to favor the species would be necessary.

We believe a mitigation plan as outlined above would protect the Colorado Butterfly Plant and would not significantly alter the Proposed Action. For all these studies, we would assume you would select qualified professional plant physiologists, plant ecologists and hydrologists.

Sincerely,

Bob Kiesling
Big Sky Field Director

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WYOMING NATURAL HERITAGE PROGRAM

November 11, 1983

Major Peter Walsh
AFRCE - BMS/DEV
Norton Air Force Base, CA 92409

Major Walsh:

Thank you for sending us a copy of the DEIS for the MX missle system being proposed for deployment at Warren Air Force Base (WAFB), Cheyenne, Wyoming. Our comments on this DEIS will be directed at rare and endangered plant species.

According to your document, "DEIS for Peacekeeper in Minuteman Silos", the impact will be high and significant in the long and short-term at the site level upon the Colorado Butterfly Plant (Gaura neomexicana ssp. coloradensis (Rydb.) Raven & Gregory), a candidate endangered species. We find this impact upon this highly restricted endemic to be unacceptable. This impact is in violation of two separate documents: first, this species is protected by the Endangered Species Act which does not allow for loss of critical habitat and second, a Memorandum of Understanding (MOU) exists between WAFB, the U.S. Fish and Wildlife Service, and The Nature Conservancy, to protect this plant species.

1420 The construction of new roads on WAFB for movement of the stage transporter from the weapons storage area to the stage storage area given in proposed action R2 (Fig. 1.6.2-2) will bisect the known habitat of the Colorado Butterfly Plant. Both the road alternatives and design option are unacceptable under action R2. The reason for this is loss of known habitat of this plant species. Other factors that could also threaten this species further are: alteration of stream flow, changing water saturation levels in the soil during germination periods, silation, and unknown water requirements might not be met during the growing season due to changes in the water flow, i.e., the species may require natural flooding of habitat which could be eliminated through flood control to protect these roads. Alternative R3 proposes the same new roads through the known habitat and is therefore also unacceptable.

The only alternative that is acceptable is R1. However, even this alternative bisects another population of this plant species, although this habitat has already been partly destroyed. This population was discovered by your consultants, URS-Berger, last summer. When they failed to alert the proper personnel at WAFB, the population was sprayed during a noxious weed control program. At least 60% of that population is now destroyed, so we feel that enlarging the existing road will not make matters much worse. However, the populations along Crow and Diamond

100% Recycled Paper

Major Peter Walsh
November 11, 1983
Page 2

1420 Creeks are still vigorous and can not be destroyed because they remain the last stronghold for the species.

We would like to address some of the mitigation measures included in Section 3.2.2.5.2.2 Threatened and Endangered Species. They are as follows:

1438 1. Monitoring effects of the core of depression associated with increased groundwater use for the riparian habitat of the Colorado Butterfly Plant seems to be after the fact type of reasoning. This measure does not address loss of habitat, but assumes the roads will be built and if the water monitoring does show a decrease, it does not propose any action to save the plant or its habitat.

1439 2. Under both the unavoidable adverse impacts and irreversible and irretrievable commitment of resources, the loss of critical habitat is addressed for this plant species. My question to you is if the new roads under R2 and R3 would be placed through the habitat and some unknown parameter is changed which causes the decline or extinction of this species, what mitigating measures would bring this species back into existence? The intent of Congress is clear under the Endangered Species Act, that species such as this have priority protection.

We therefore can only support alternative R1. This alternative still bisects a population of the plant species but the vigor is already in question due to previous actions of URS-Berger and the Air Force.

Sincerely,

Robert W. Lichvar
Plant Taxonomist/
Program Coordinator

RWL/mew

269

STATE OFFICE
P.O. BOX [illegible]
LINCOLN, NEBRASKA [illegible]
402-475-MALT

NEBRASKA NUCLEAR WEAPONS FREEZE CAMPAIGN

Comments on the Draft Environmental Impact Statement (DEIS)
by the
Nebraska Nuclear Weapons Freeze Campaign

Protective Measures

Although the DEIS states that an analysis of protective measures (superhardening of protective structures, deep basing, and the use of ballistic missile defense) is not included in the DEIS for the reasons stated in 1.5, it is clear that there is great public concern about such systems as evidenced in Appendix D (A-10, B-1, B-2, D-1, E-2, I-1). In addition, the DEIS states that "Long range planning in the strategic land-based intercontinental
35 ballistic missile area concerns primarily silo hardening and small single warhead development." (D-14)

Because of this public concern and because of research and development in this area, the public should be guaranteed that any changes in the basing mode of the MX for protective measures (superhardening, deep basing, ballistic missile defense etc.) would result in a new EIS.

Arms Control

The response to A-11 and B-11 in Appendix D highlights the continual contradictions of the purpose of the MX with regards to arms control.

The statement, "Deployment of Peacekeeper (MX, sic.)...provides incentive to the Soviets to negotiate equitable, verifiable agreements at reduced levels," (D-15) appears to contradict the position of the President that the MX needs to be built regardless of arms control. ("And the thing is, this is not in the same
125 sense of a bargaining chip that somebody can say, well, you're building it just to tear it down. No. We need modernization. Even if we get reduction of arms ... this (MX) would not be the missile that would be taken out of circulation." Taken from the transcript of President Reagan's news conference of foreign and domestic matters; N.Y. Times, December 15, 1982) Thus, it appears that the MX by itself offers no incentive to the Soviets in the area of arms control.

The public deserves a clear and precise definition of the purpose of the MX with regards to arms control. In addition, until such a purpose is defined, the EIS should refrain from making such declaratory statements.

THE FREEZE

Land Use

The DEIS states that the "distance quantity zone" around each silo must be increased from 1200' to 1750' for safety purposes. 9 families, as a result, must be removed from their homes. This impact comes without the prior knowledge of the Congress.

189 In 1979, the U.S. House of Representatives passed an amendment to HR 2575 that would direct the Secretary of Defense "to not choose a site" for the MX "that would result in the displacement of farmers and ranchers from their homes and land or which would result in making farm land unproductive." (Lincoln Journal, 6/7/79). The proposed basing scheme, as the DEIS has revealed, clearly violates the spirit of the Congress.

185 In addition, the Air Force admits that 1750' for the distance quantity zone is an estimate, and that the exact size of the zone won't be known until testing in 1984. It can therefore be deduced that possibly more families will be removed from their homes as well.

To insure that the spirit of the Congress is respected, the MX should be put on hold until an exact determination of land usage is known. The Congress then should have the opportunity to debate and decide whether or not this basing mode is acceptable on such terms.

Land Use Reimbursement

It appears that families who must be removed from their homes will not get a fair reimbursement:

> 188 As of now, the Air Force is not planning to compensate the Klevinskes or any other farmers if their outbuildings — barns, sheds, silos — are within the zone.
> Capt. Michael McMullin said following the Environmental Impact hearings here (Wheatland, Wyo.) that only "inhabited dwellings" are covered by the Air Force's offer to buy or relocate buildings within the zone. (Casper Star-Tribune, 11/4/83)

This result, simply, would be outlandish, and should be corrected immediately.

Economics

436 The Air Force has repeatedly said that the deployment of the MX will improve the economics of the affected areas. However, Air Force figures show that the city of Kimball alone will lose $9,984 (1982 dollars) from projected carryover funds over the ten year period of construction (3-38 & 3-40). Also, "increased demand pressures leading to inflationary housing costs or rental prices could occur during the short-term period of construction." (3-34) This will significantly affect the economics of individuals, particularly the growing elderly population of Kimball, most of whom are on fixed incomes. Finally,
87 the issue of who will pay for mitigation measures suggested by the Air Force

87 is not clear, but it can be expected that the local area and region will have to take a large share of the burdens. This, too, will affect the local area's and region's economies significantly.

In addition, the 27.5 billion dollars projected for the development and procurement costs of the MX missile alone will cost the average American family
117 over $400, with the 3rd Congressional District of Nebraska standing to lose 55.2 million dollars of its tax resources.

The EIS and the Air Force should be more objective and frank in their assessment of the economic benefits and costs of the MX missile deployment, particularly within the affected local areas. The EIS is meant to analyze the impact of the MX missile deployment so that appropriate mitigation measures can be developed —not to sell the MX missile itself — and Air Force officials overseeing this project should reflect this fact in their statements as well.

Funding

87 1) Who will pay for the mitigation measures suggested by the Air Force?
984 2) Who will pay for improving and maintaining state and county roads during and after deployment?
983 3) Who will pay for the new 10KV substation, to be built on the south side of Kimball?

Mitigation Measures

90 Discussions of mitigation measures throughout the DEIS are general. Because of this, it is impossible to evaluate the DEIS in terms of feasibility, and thus how the environment will be affected by the actual deployment is without meaning. A more comprehensive document is in order.

Prepared by:
Brian Cope
Brian D. Cope
State Coordinator
Nebraska Nuclear Weapons Freeze Campaign
November 22, 1983

270

TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-465

271

October 10, 1987

Yvonne Beaman, Director
MX, Policy Research Office
[illegible]

Dear Ms. Beaman:

Enclosed are the comments of NO MX on the socio-economic Impact Statement. Please feel free to call me or Jeff Tracy if you have any questions about our submission.

Thank you for your assistance in this matter.

RECEIVED
[illegible]
POLICY RESEARCH

Sincerely,

[signature]
[illegible]
Commissioner

NO MX

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NO MX

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presently at or above capacity. (Daycare, page 8-99; Family Planning, page 8-100; Office of Mental Retardation, page 8-102) Yet, the final assessment is that there will be no adverse impact from the increased project-related population. (Page 8-115) Furthermore, while the study admits (page 8-93) that these agencies serve the entire Panhandle, the no impact conclusion is based only upon projection from the Scotts Bluff County population increase, rather than that from the entire region (page 8-115). Moreover, no account is taken of increased use of social

823 services agencies by current residents, due to the psychosocial impacts of an influx of transient workers, many of whom will apparently spend weekdays here without their families. Finally, it should again be noted that mental health facilities in Scottsbluff serve the entire region, and that residents of the entire region may indeed suffer increased mental health problems as a result of the very nature of the project. The costs of dealing with these problems, along with the number of personnel needed and a statement of how they can be trained must properly be included in the study.

For Kimball County, the document reports that the social services agencies, primarily Community Action and Department of Social Services, presently serve 2 to 10 indigent transients a month. There is no discussion of service and fiscal impacts of indigent jobseekers who will

827 appear in the area, although Chapter 2 (page 2-28) acknowledges the fact that this will be a problem. This question is particularly important for the individual counties, because single and childless indigents are generally not eligible for state and federally funded assistance programs, but are required by state statute, Chapter 68-103 et seq. Nebraska Revised Statutes, 1943 as amended, to be helped with county funds. It is incumbent upon the Air Force to give accurate numerical estimates and fiscal projections, in order to allow the

827 counties to plan adequately for these demands upon their treasuries. Again, the document merely finds no impact and lets the issue go. (Page 7-56)

Housing Impact

If the assumptions upon which the study is based are accurate, there will be sufficient housing for project workers who move to the Kimball area. However, there appears to be a shortage of weekly commuter housing. The Air Force estimates 99 persons in this category (Page 7-56) The study indicates (page 7-67) that there are no motel facilities with weekly or monthly rates for use by these persons. Further, extrapolation from the figures presented in the document indicates that during the summer months, only 14 nonfranchised and 25

382 franchised motel rooms are available, for a total of 39. Thus, while there will be adequate motel space during the off season, there will be a serious shortage during the summer. The study should discuss the potential adverse impacts of this phenomenon on tourism in Kimball and the regions to the north for which it serves as a jumping-off point from interstate 80. If all motel rooms are filled with MX construction workers, where will tourists choose to go instead? Finally, it is necessary to question the internal consistency, and thus the validity of the whole study, since it indicates, in Table [illegible] (page [illegible]), that only 25 rooms will be needed for commuter workers. Given this data, the no impact finding is suspect.

381 The no impact finding for Scotts Bluff County is also questionable. Particularly in regard to mobile home spaces, there will be a shortage in the cities of Scottsbluff and Gering in 1987 and 1988 (pages 8-[illegible] and 8-136), and the study indicates that there are no plans to increase the spaces available in mobile home parks (page 8-[illegible], referring back

to Chapter 1, we see that the Air Force has contemplated a need to ease up on housing and zoning codes in order to accomodate its workers. (Page [illegible]). This will certainly have an impact in several areas, and

381 should be honestly addressed by the study. In particular, proposals should be made for what sorts of noncompliance may be allowed, and how that will impact, fiscally and otherwise, the zoning authority and its citizens.

School Impact

As is discussed earlier, it is imperative that the study deal with the effects of the project's nature upon the school children. Not only curriculum development and teacher training, but also training of mental

809 health workers for the schools must be addressed. This discussion must include accurate cost estimates, and realistic assessment of the numbers of students who will require special services due to the effects of living in a nuclear target area. None of this is addressed in the current document, making it totally inadequate in this regard.

Moreover, the effects of the project on future generations of school children must also be evaluated. Studies of SAT (Scholastic Aptitude Test) scores show an inverse relationship between atmospheric nuclear testing in the late 1940's and the 1950's and the cognitive

177 abilities of the respective cohorts of students thereafter. (Ernest J. Sternglass and Steven Bell, "Fallout and SAT Score: Evidence for Cognitive Damage During Early Infancy", Phi Delta Kappan, April, 1983, pp. 539-545.) The trend reversed concomitently with the cessation of atmospheric testing in 1965. The Draft Environmental Impact Statement prepared by the Air Force for this same project recommends the removal of nine families from their homes, due to the danger of explosion in the transportation of the missiles. The possibility of one of these

177 explosions involving a warhead, and the effects upon the population, whether from detonation or leakage of radioactive material, must be included in the socioeconomic analysis.

Law Enforcement Impact

In Chapter [illegible], which provides an overview of the project impacts, the study lists increased traffic accidents, disorderly conduct and civil disorders as probable law enforcement problems (Page [illegible]). It further states that there will be a necessity for training in dealing

810 with these areas of enforcement, particularly the latter two. However no mention is made of these needs in the analyses for the individual Nebraska counties affected by the project. What will be the costs of such training? What will be the realistic numbers of law enforcement personnel needed to deal with these impacts? What will be the costs to the state if local agencies are not capable of dealing with mass demonstrations or other civil disorders? How will law enforcement personnel be trained to deal with possible mass panic if one of the transporter stages explodes, as contemplated in the DEIS? Will the Air Force reimburse the counties and states for costs incurred in such eventualities?

Courts Impact

The document states that the increased transitory labor force will increase the burden on the criminal justice system, particularly the courts. (See page 8-10, for example) Chapter 1 suggests that this

815 could be remedied by instituting night sessions for the courts. However, there is, again, no detailing of the costs of such a solution, nor of who would bear those costs, in the Nebraska portions of the study.

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Page 7

Roads Impact

According to the study (section 9.4.4) it "became apparent that the countywide rural road network associated with the launch facility modifications needed detailed study". "Population associated traffic increases for Harrisburg were negligible and did not warrant detailed study":

1024 "While the population increase in Harrisburg may be negligible, the traffic that goes through the town on route to work, or coming into town to relax before heading home is going to be more than negligible.

1087 "No detailed study has been done in Banner County on road impact by URS, despite the assessment, noted above, that it is needed. According to Banner County officials, URS came out for 2 days within a one week period to observe and take traffic tallies. This is an insufficient sample from which to formulate actual usage and to project impact.

1083 "At section 9.4.4.3, the study says "For county roads, 1988-89 traffic volumes are considerably less than the volumes identified above for state highways." What is not said is that a) there is no percentage increase predicted for state highways. There is a numerical estimate only (120 vehicles, including 20 heavy trucks) likewise, this is not broken down into percentages for rural county roads, and no numbers are given

b) county roads currently have less traffic than state highways. The "considerable less" volume on county roads may well constitute a substantial increase over present usage. In particular, this is true for the 1988-89 period when proposed construction would be heavily concentrated in Banner County

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Example	state highway vehicles/day	county road vehicles day
	1983 = 1500	1983 = 10
	1989 = 1900	1989 = 70
# increase	= 400*	= 600*
% increase	= 26 %	= 1111%

1083 *460 is the number derived from the study. It is not unrealistic to assume that a county road with 2 miles under construction could have 100 new vehicles per day

(Because no hard estimates for present county usage are given and no numbers for project usage are stated, the numbers in the above analysis may be somewhat incorrect, but it is quite certain that the traffic levels a peak construction will be at least double or triple their baseline levels.)

The study makes no mention of where funds will be obtained to upgrade the roads to handle the 200,000 pound loads projected by the Air Force. No cost estimates for the upgrading are provided. No statement is made as to who will pay for the upgrading, or the continued maintenance. The study neglects to mention the fact that the missiles will be transported in three or four parts and assembled at the site thus tripling or quadrupling the number of extremely heavy loads. No allowance is made for the fact that the Minuteman missiles must also be transported out of the area. Nor is account taken of the fact that the Air Force plans periodic replacements of missiles which will require continuing security measures (temporary road closures and extraordinary maintenance over a period much longer than the stated three year duration.

1084

1081 In section 9.4.4.3 the study says that each major bridge must be individually evaluated to assess its ability to safely carry/accommodate the stage transporter vehicle. However that study apparently remains undone. Thus there is no way for the public to

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Page 4

assess the impact of the project on 21 bridges in Banner County and 4 bridges in Kimball County. Again, no costs are presented, and no statement is made as to who will bear the costs.

1081 Furthermore, for rural residents to have a bridge out of commission for even a week may cause considerable hardship and delay in traveling to school, church, shopping or for visits or medical care. It may add many miles to each trip, resulting in increased expense. Because no timelines or cost estimates are given, residents and county governments have no way of knowing what the real impact will be.

1080 The study mentions that "structural deficiencies identified in this report will be verified through an evaluation process by the Military Traffic Management Command, the Federal Highway Administration, the Department of the Air Force, and the state and local transportation departments." No timeline for the report or the evaluation is given, nor is it stated who will pay for the time and resources state and county employees will spend in doing the analysis.

1076 Finally, the study concludes each of the county roads sections with the statement that there is no need to propose more specific mitigative measures "since other impacts will be addressed during project construction and operation". (See Page 8-140, for example) This reasoning blatantly circumvents the rationale for impact planning, and can only be taken as a demonstration of bad faith and cursory compliance with the process on the part of the Air Force.

Conclusion

60 This study was to have given the people of Banner, Kimball and Scotts Bluff Counties an accurate picture of the impact of the MX deployment plan upon their lives, economy and surroundings. Instead, the entire report deals superficially with its topics and finds, often

MO MX Comments
Page

60 of contradiction of its own observations that there are [illegible]. There is little hard evidence to support any of the conclusions [illegible] impossible to determine if any detailed study was done and [illegible] it is impossible to evaluate its accuracy and to assess without the raw data upon which earlier promises and conclusions were based.

The potential impact upon the people and the land in the area by the deployment of an entirely new weapons system demands the highest quality detailed study. The instant document is far short of that standard. The people of the affected area, and of the whole state of Nebraska, deserve and demand a new and accurate assessment of social and economic impacts of the project, before any more deployment planning is done.

--Prepared by Jeff Tracy, Coordinator
Susan I. Buckles, Esq.,
Executive Committee Member

272

TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-467

273

Nebraskans Opposed to the MX
P.O. Box 125
Scottsbluff, Nebraska 69361
1-308-635-7768

COORDINATOR
Jeff Tracy

October 16, 1985

Ms. Sharon Torgerson
AFRCE SMS DEV
Building [illegible] Room 120
Wright-Patterson Air Force Base, OH
[illegible]

Dear Ms. Torgerson:

Jayne Malmquist of the Nebraska Peacekeeper Working Group called my office an hour ago to say that due to a mistake in her office the statement that Nebraskans Opposed to the MX had prepared for the Socio-Economic Impact Statement had not been sent on to you with the other statements from the state of Nebraska. Ms Malmquist has assured me that she is in the process of Federal Expressing the letter out to you today but was afraid that it would not be in time. I am therefore also attempting to mail a copy of our statement to you.

Please note that the time period is now over for commenting, however, as I am sure Ms Malmquist will explain, our statement was in to her office by the 15th of October, which was plenty of time to have been included in mailings to you. Several hours of work went into the preperation of our statements and I would ask that because of this and the mistake in the Peacekeeper Working Group Office that you allow the comments to be entered in the final report even though the comment period is officially over.

I apologize for the tardiness of this report but again, I ask that you allow it to be included in the final EIS.

Thank you for your time. I hope to be hearing from you soon.

Sincerely yours,

Jeff Tracy
Coordinator for NO MX

NO MX

[illegible]

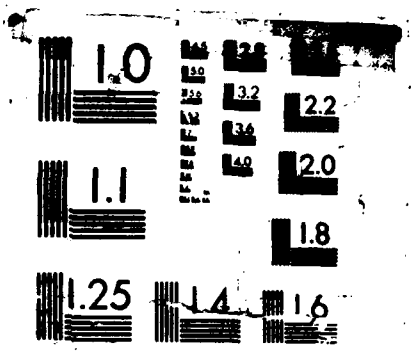
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AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 4/9

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MICROCOPY RESOLUTION TEST CHART

NO MX Comments
Page 3

presently at or above capacity. (Daycare, page 8-99; Family Planning, page 8-100; Office of Mental Retardation, page 8-102) Yet, the final assessment is that there will be no adverse impact from the increased project-related population. (Page 8-115) Furthermore, while the study admits (page 8-93) that these agencies serve the entire Panhandle, the no impact conclusion is based only upon projection from the Scotts Bluff County population increase, rather than that from the entire region (page 8-115). Moreover, no account is taken of increased use of social

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NO MX Comments
Page 4

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NO MX Comments
Page 5

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In section 9.4.4.3, the study says that "Each major bridge must be individually evaluated to assess its ability to satisfactorily accomodate the stage transporter vehicle." However, that study apparently remains undone. Thus, there is no way for the counties to

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1081 Furthermore, for rural residents to have a bridge out of commission for even a week may cause considerable hardship and delay in travelling to school, church, shopping or for visits or medical care. It may add many miles to each trip, resulting in increased expense. Because no timelines or cost estimates are given, residents and county governments have no way of knowing what the real impact will be.

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Conclusion

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in contradiction of its own observations, that there will be no impact. There is little hard evidence to support any of the conclusions. It is impossible to determine if any detailed study was done, and if it was, it is impossible to evaluate its accuracy and fairness without the raw data upon which major premises and conclusions were based.

69 The potential impact upon the people and society of the area from the deployment of an entirely new weapons system demands the highest quality detailed study. The instant document falls far short of that standard. The people of the affected area, and of the whole state of Nebraska, deserve and demand a new and accurate assessment of social and economic impacts of the project, before any more deployment planning is done.

--Prepared by Jeff Tracy, Coordinator
Susan L. Buckles, Esq.,
Executive Committee Member

274

Nebraskans Opposed to the MX
P.O. Box 125
Scottsbluff, Nebraska 69361
1-308-635-7768

EXECUTIVE COMMITTEE
Susan Buckley, Esq.
Martin Bumgarner, Esq.
Kathleen Glatz
Marian Lenzen
Rev. Howard Osborne
Kathleen Shade

COORDINATOR
Jeff Trac

AN OVERVIEW OF SHORTCOMINGS OF THE DRAFT MX ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Introduction

36 The basic problem with the DEIS is that it is often general, rather than specific, about the effects of MX construction. Impacts are repeatedly described as "low", "moderate" or "high" with no specific discussion of what those terms mean. The actual effect of the MX in a given area is thus not clear.

90 Another problem is that mitigation measures (that is, measures to soften the adverse impacts) are usually mentioned in cursory fashion. This makes it impossible to evaluate whether they are appropriate or feasible.

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148 A few areas of great concern are not addressed at all. These include the environmental impact of a Soviet attack on the MX silos, the effects of possible accidents involving MX missiles, and the effects of MX security procedures upon the rights of citizens and residents in the deployment area.

The Deployment Plan

The Air Force's deployment plan calls for the replacement of 100 of the existing Minuteman III missiles with 100 MX missiles. Existing missile launch facilities will be used, with modifications. Missile replacement will occur within the two squadrons closest to Warren Air Force Base, the 319th and the 400th, which are located in Nebraska and Wyoming. Additional buried hardened intersite cable systems will be laid to link the MPAs and LCFs to stations. A number of support buildings will be constructed or altered at Warren AFB, in the towns. The MX system is scheduled to achieve initial operational capability in December 1986 and to be fully operational by late 1989.

Summaries of Sub. Problem Areas

ECONOMICS

1. The DEIS (and Air Forces publicity people) repeatedly hint that the coming of the project will be an economic boost for the area. However, Air Force figures show that the City of Kimball alone will lose $9,984 (1982 dollars) from projected carryover funds over the ten year period of construction. (3-38 & 3-40)*

2. There is no discussion of impacts upon area businesses:

429 a. who will really benefit economically from the MX?
b. are there hidden costs that are not mentioned?
418 c. will small businesspeople face new competition from corporate franchises.

NO MX

* The DEIS is a 2600 page document. It is supplemented by 17 "Technical Reports" in specific areas. Numbers cited without "TR" are from the DEIS; those with "TR" are from the corresponding Technical Report.

418 [illegible]
452 d. will there also be an increase of suppliers of construction materials who will compete with local businesses for whatever Air Force purchases may be made in the local area?

3. There is no discussion of economic impacts upon individuals, although the Air Force admits, for example, that "increased demand pressures leading to inflationary housing
429 costs or rental prices could occur during the short term or period of construction". (3-41)

436 a. how will highly inflated rent and other costs affect the growing elderly population of Kimball, most of whom are on fixed incomes?
431 b. what impacts will this boom-bust phenomenon have on surrounding communities?

LAND USE

1. The "distance quantity zone" around each silo is increased from 1200' to 1750'.
a. the Air Force admits that 1750' is an estimate, and that exact size of the zone won't be known until testing in 1984...how many families will really be displaced?
185 b. will the Air Force guarantee that no additionaly land will be used or restricted because of deployment of the MX?

2. The "distance quantity zone" from a silo to a public road is increased from 720' to 1050'.

a. the Air Force admits that the present 720' is not observed in many cases; why do these requirements exist if they are so easily disregarded?
190 b. the Air Force anticipates similar exemptions for silos with the MX: who grants the exemptions for these safety zones, and what risks are considered in making the decision whether to grant the exemption?

3. [illegible] consents for at least 4 cable routes, involving a minimum of 127 acres, will be required.

a. [illegible] how long will land underlying the easement be out of production, and will owners be compensated for this during construction activities.
1140 b. how will routine maintenance procedures affect land in production, and for what proportion of each year?

SOCIAL SERVICES

1. The Air Force projects that during the peak construction year (1988-89 for Kimball) there will be a maximum of 119 new people in town. This is the number used to determine the level of impact on a whole range of services and public finances. (3-92)

228 a. in a period of high unemployment, when jobs are known to be available, more people will seek work than are needed, yet the Air Force bases all its projections upon the number of actual jobs: how many people will really come to the area?
552 b. although the Air Force admits that many social services are provided on a regional basis from Scottsbluff-Gering, it uses its actual job figures to justify not discussing actual population induced impacts outside of Kimball County; what will be the impact of unsuccessful job seekers on human service providers and consumers in the region?

2. There is serious inconsistency within the DEIS re: what the actual level of population and [illegible] impact will be in Kimball (the only area discussed). In the Social Service

Section, Health Care, Law Enforcement, Human Services and Criminal Justice are all listed as suffering negligible impact. (3-115, 3-116) However, in the Social Well Being Section it is stated that "the absence of most human services in [Kimball] County is an indication that people must travel to most services or do without certain ones. Those few existing human services also may be more heavily impacted as will other services such as law enforcement and those provided by volunteer groups. The impacts on social well-being, as a result of this human service shortage, are rated moderate and significant in the short term." (3-87)

581 a. what will be the actual level of impact: negligible, low or moderate?
b. if more than negligible, how will the adverse impacts be mitigated?

SOCIAL WELL BEING

In this section, the Air Force maintains that the population increases anticipated will bring both positive and negative effects. Some of the "positive" ones are demonstrably not true (such as increased social services for Kimball because of increased tax base--see above).

Problems anticipated include:

552 a. surplus job seekers will drain social service agencies and bring the problems associated with high unemployment. (3-86).
486 b. how young adults may have difficulty assimilating into the community because of limited social, entertainment and recreational opportunities (3-86).
485 c. increased substance abuse will bring its attendant problems, including increased traffic accidents and violations (3-87).
504 d. incidents of domestic violence will increase because of lack of social opportunities (3-87).
529 e. law enforcement and volunteer agencies will be heavily used, with heavy impact upon their resources.
185 f. several families will be heavily affected by dislocation from the "quantity distance zones".

TRANSPORTATION

1. Operations of the MX system will be similar to the Minuteman system, except for the [illegible] of the missiles. MX stages will be transported in four separate parts, on a "stage transporter" which is 100,000 pounds heavier, 12 feet longer, and 1 foot higher than the Minuteman transporter erector.

984 a. what will be the actual costs of improving and maintaining state and county roads during and after deployment?
b. who will pay these costs?

2. "Transportation" is defined as "...the safe and efficient movement of persons and goods." (2-52) Interestingly, the Air Force omits discussing the transportation of its own "goods"--the MX missiles. Moreover, there is no mention of the hazards caused by use of the roads by Air Force personnel once deployment is completed.

145 a. what restrictions on road use will be imposed upon citizens when the stages are being transported?
b. what safety precautions will be imposed by the Air Force upon its own personnel and upon the residents whon the MX is being moved?
141 c. because the MX is such a sophisticated weapon, are there not any new restrictions that will be imposed once the missile is in place?

1001 a. [illegible] what are [illegible] standards used, and what will be the impact [illegible] if [illegible] these standards are not met?
997 b. who [illegible] [illegible] [illegible]

1329 in the DEIS: what will these impacts be?
1366 c. soil erosion problems resulting from road construction and cable laying
1408 and their impact upon the biological environment were likewise ignored: what will these impacts be?
d. why were extensive secondary sources consulted for biological impacts in Wyoming and Colorado, but very few for Nebraska?

38 2. Another glaring deficiency of the DEIS is its failure to identify, describe and evaluate an appropriate monitoring program for the proposed deployment. Without a monitoring program, it is impossible for the public to know whether or not a standard has been violated. Without a monitoring program, we are without a way to hold the Air Force accountable for the measures of safety which they claim to have established.

Conclusion

The most serious questions raised by the DEIS are those regarding what is NOT found in it. Five issues which must be addressed, but which are not covered by the DEIS, are:

a. who will pay for the mitigation measures suggested by the Air Force?
b. what restrictions on personal privacy and movement will be imposed upon local people once the missiles are in place?
c. why does the Air Force refuse to answer the public's questions regarding the "what if's"?
d. why does the Air Force refuse to comply with laws set up for the protection of people and their environment?
e. why is the Air Force granting itself exemptions from safety standards it has set for itself?

What Can You Do?

The DEIS/EIS process is extremely important. The comment period is an opportunity for you to ask questions for make comments to the Air Force about its proposed MX deployment.

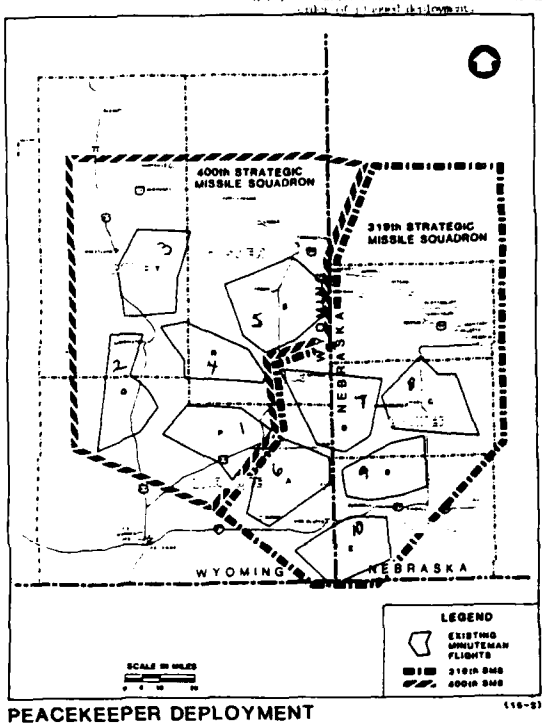
- o public hearings will be held in Nebraska on November 4, in Harrisburg and Kimball.
- o written comments must be submitted by November 28: send to:

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, CA 92409

- o if you want to look at a specific section of the DEIS or a technical report, you can find copies at your public library.
- o if you would like more information on the DEIS/EIS process, please contact the NO MX office, PO Box 125, Scottsbluff, NE 69361, telephone (308)635-7768.
- o remember that you must comment on the DEIS in order to have the right to object to the final EIS.

(A map of the planned deployment area is included on the reverse, for your information.)

5



PEACEKEEPER DEPLOYMENT AREA

FIGURE NO. 1.1-1

1-2

275

TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-436

276

TO: USAF

FROM: NEBRASKANS OPPOSED TO THE MX (NO MX)
NEBRASKANS FOR PEACE (NFP)

RE: COMMENTS, MX DEIS

DATE: NOVEMBER 28, 1983

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APPENDIX

Exhibit A

List of Preparers

I. THE DEIS FAILS TO MEET MINIMUM NEPA STANDARDS.

The National Environmental Policy Act of 1969, as amended, (NEPA), P. L. 91-190, 42 U.S.C 4321 et seq., January 1, 1970, as amended by P. L. 94-83, August 9, 1975, hereinafter NEPA, read together with the Council on Environmental Quality, hereinafter CEQ, regulations is the basic national charter for protection of the environment. 40 C.F.R. §1500.1 and §1500.3.

A. It fails to disclose the full scope of the project.

35 The proposed "Peacekeeper" action, slated for deployment from 1984-1990, is defined as limited to replacement of 100 Minuteman III with 100 MX missiles as a means of upgrading the U.S. land-based ICBM system. The issues of the present "vulnerability" of the Minuteman III and the "survivability" of the proposed Peacekeeper prompted the proposed action (see Scowcroft report, page 9), although neither issue has yet to be resolved.

40 C.F.R. §1502.4(a) and 40 C.F.R. §1508.25 mandate consideration of closely connected actions, defined in relevant part as "independent parts of a larger action and depend on the larger action for justification." 40 C.F.R. §1508.25(a)(1)(iii). In this instance, the "larger action" is the upgrading of the F.E. Warren missiles to ensure a survivable and/or first strike land triad. Placement of an ABM system and/or deep basing and/or superhardening of the existing silos to ensure survivability are reasonably foreseeable scenarios (Scowcroft report, page 2) and should have been both disclosed in the DEIS and impact evaluated.

Notwithstanding the claims of the Department of Air Force, hereinafter the Agency, that the Peacekeeper deployment portion of the larger action is not connected to these scenarios and that the issue of survivability of the MX will not be addressed in the reasonable, foreseeable future (DEIS §1.3), these bald assertions are not based in fact and are contradicted by the Scowcroft Commission itself, which issued the following recommendation for ICBM modernization:

35 a. Engineering design should be initiated, now, of a single-warhead ICBM weighing about fifteen tons; this program should lead to the initiation of full-scale development in 1987 and an initial operating capability in the early 1990s. Deploying such a missile in more than one mode would serve stability. Rockpool silos or shelters and hardened mobile launchers should be investigated now.

b. One hundred MX missiles should be deployed promptly in existing Minuteman silos as a replacement for those 100 Minutemen and the Titan II ICBMs now being decommissioned and as a modernization of the force.

c. A specific program to resolve the uncertainties regarding silo or shelter hardness should be undertaken, leading to later decisions about hardening MX in silos and deploying a small single-warhead ICBM in hardened silos or shelters. Vigorous investigation should proceed on different types of land-based vehicles and launchers, including particularly hardened vehicles. (Emphasis supplied.) Scowcroft report at p. 21

40 C.F.R. §§1500.2© and 1508.28 permit "tiering," but only after the broad programmatic DEIS covering the entire project is completed. The nondisclosure of alternative and reasonably foreseeable survivability modes, such as the ABM, deep basing, and superhardening, is an improper "segmenting" of the DEIS.

B. It fails to present an adequate discussion of alternatives to the proposed action.

The CEQ regulations state that the discussion of alternatives to the proposed action "...is the heart of the environmental impact statement." 40 C.F.R. §1502.14. The decisionmaker is required to take a "hard look" at all alternatives before making a final decision; thus, all reasonable alternatives must be discussed.

1. It lacks a "no action" alternative.

76 The "no action" alternative (40l C.F.R. §1502.14(d)) has been described as "the most significant" of all alternatives because it presents the threshold question of whether any action is necessary. NRDC v. Hughes, 437 F. Supp. 981 (D.D. Cir. 1977), modified, 454 F. Supp. 148 (D.C. Cir. 1978). Despite its fundamental importance, the "no action" alternative was generally "discussed" to in 2-3 sentences and summarily discounted in each instance. Such cursory treatment of this alternative

violates NEPA. Id. By failing to adequately present information—which would include an objective and rigorous presentation of baseline data and specific projections of the effects of the alleged "current trends in human population-related impacts" throughout the proposed deployment period—the Agency has failed in its duty to inform the public and other governmental agencies of all reasonable alternatives as has thereby effectively deprived the public of their statutory right to comment on this option. Id. In essence, the Agency has failed to take a "hard look" at all management options available and, therefore, has biased and invalidated those alternatives that were presented. Id. at 1720.

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2. It lacks a "deferred action" alternative.

The CEQ has indicated in its EIS preparation guidelines that a consideration of "postponement of activities" is a reasonable alternative and must be considered where information relevant to a determination of adverse impacts is unknown and the costs of obtaining it are not exorbitant. 40 C.F.R. §1502.22. Additionally, case law interprets NEPA itself as requiring such a consideration especially when it is apparent that scientific or technical expertise will be more able to predict actual environmental trade-offs of proposed activity at a later date. Alaska v. Andrus, 580 F.2d 465, 11 ERC 1321 (D.C. Cir. 1978).

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In light of (a) the projected high and significant short-term impacts on the F.E. Warren AFB including significant impact on threatened and endangered species (EPTR, §§3.6.2. and 3.6.2.2), and (b) the significant baseline data and projected impact inadequacies throughout the DEIS raised in Part V, infra., deferred action is a critical alternative at this stage and Agency failure to consider this alternative renders the DEIS inadequate.

3. It lacks an adequate range of alternatives.

NEPA requires that environmental values be appropriately represented in the formulation of alternatives. As regards the biological resources, the impact is not ascertainable because the measure of impact is insufficiently quantified. It is apparent that the

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proposed alternatives were designed to display only a range of acceptable economic and defense proposals, which is an improper limitation of alternatives. No discussion of the Midgetman alternative, or an alternative that would deploy the MX-replacement missile system at other Minuteman III installations or elsewhere under F.E. Warren jurisdiction was offered. Selection of alternatives on these grounds fails to fulfill NEPA which envisions the presentation of alternatives displaying a broad range of environmental impact.[1]

76

The primary purpose of the environmental impact statement is to "...serve as an action-forcing device..." to ensure NEPA policy/goals are reflected in federal agency action. 40 C.F.R. §1502.1. It shall provide "...full and fair discussion of significant environmental impacts.. [informing] the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." Id. It is more than a disclosure document since it "...shall serve as the means of assessing environmental impact...rather than justifying decisions already made." 40 C.F.R. §§1502.1 and 1502.2(g).

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[1] CEQ guidelines provide examples of alternatives that should be considered, such as "no action," "deferred action," alternatives requiring actions of a significantly different nature which would provide similar benefits but have different environmental impacts, and alternatives which proposed different designs or details of the proposed action which also present different environmental impacts.

Alternate basing modes and deployment locations are appropriate alternatives which were not considered. Regardless of whether the Jackson Amendment, Pub. L. 97-377, 96 Stat. 1833, 1846-48 (1982), lawfully exempts the Agency from NEPA, the Agency has agreed to prepare an EIS for the proposed action to meet the requirements of NEPA and the CEQ regulations (DEIS §1-1; Interstate Compact between Nebraska, Wyoming and the Agency) and is thereby estopped from raising the Jackson defense.

4. It fails to rigorously, fully, and candidly discuss the impacts of the proposed action alternative itself.

40 C.F.R. §1508.14 requires that the scientific and analytic basis for impact explanations of all alternatives, including the proposed action, be thoroughly discussed. It requires more than a mere identification of impact—it envisions a full and candid disclosure of both the effects and their significance. In this respect §1502.14, §1502.15 and §1508.16 requirements differ—the former two are descriptive, the latter interpretative.

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Assuming arguendo that the DEIS fully identifies all environmental impacts vis-a-vis, for example, biological resources, it nevertheless fails to meaningfully interpret the effects of short-term and long-term project impacts (EPTR § 3.6) or the consequences of failure of the proposed mitigation measures (EPTR 83.7) or the effects upon the region of the unavoidable adverse impacts. A thorough discussion of the DEIS inadequacies as regards description and interpretation of MX impact on human and natural resources as is envisioned by §1502.16 is included at Part V, infra.

II. THE AGENCY'S RELIANCE ABOVE ON PROPOSED MITIGATION MEASURES IS AN [illegible] OF ENVIRONMENTAL EFFECTS.

Perhaps the most glaring deficiency of the DEIS is its failure to identify, describe and evaluate an appropriate monitoring and enforcement program. 40 C.F.R. §1505.2(c).

There are at least 3 essentials to a successful monitoring program:

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(1) a standard, both reliable and identifiable, must be established to alert the Agency, the "monitor," the contractor, and the public when deployment activities must stop;

(2) a statistically reliable procedure of measuring parameters must be employed so everyone will know when and if a standard is exceeded;

(3) means of promptly stopping deployment activities must be available to prevent resource deterioration once the standard has been reached.

The DEIS, although generally proposing mitigation measures for anticipated resource impacts, consistently fails to include a program

of enforcement or compliance monitoring[2]. Indeed, although the Agency in some instances identifies the party responsible for implementation of potential mitigation measures, it hastens to add that implementation responsibility does not include financial responsibility.

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III. THE DEIS FAILS TO PERFORM DUTIES REQUIRED BY FEDERAL CONSERVATION STATUTES.

The Department Air Force, as a federal agency, has a duty under NEPA to take into account all relevant conservation statutes, and duties under those statutes, before undertaking a major federal action significantly impacting the quality of the human environment such as is proposed here. Although only 3 federal Acts will be discussed here, violations of the protective and reporting provisions of the Archaeological Resources Protection Act of 1979, P.L. 96-95, §1, 93 Stat. 721, 16 U.S.C. §§470 et seq., the Historic Sites, Buildings, and Antiquities Act, Aug. 21, 1935, C. 923, §1, 49 Stat. 666, 16 U.S.C. §§461 et seq., the Fish and Wildlife Coordination Act, Aug. 12, 1958, P.L. 85-624, §1, 72 Stat. 566, 16 U.S.C. §§661 et seq., the Noise Control Act of 1972, P.L. 92-574, 86 Stat. 1234, 42 U.S.C. §§4901 et seq., the Resource Conservation and Recovery Act of 1976, P.L. 94-580, 90 Stat. 2795, 42 U.S.C. §§6901 et seq., the Clean Air Act, 42 U.S.C. §§1857 et seq., as amended, and the Earthquake Hazards Reduction Act of 1977, P.L. 95-125, §1, 91 Stat. 1098, 42 U.S.C. §§7701 et seq. will occur should the proposed action ensue.

A. The Agency has failed to perform its legal duties with regard to Section 7(a) of the Endangered Species Act (ESA) of 1973.

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Section 7(a) of the ESA, 16 U.S.C. §1531 et seq., places a three-fold burden upon the Agency: (1) it must carry out conservation programs for listed species; (2) it must ensure that its activity will not jeopardize the continued existence of any threatened or endangered

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[2] The only "monitoring" contemplated for biological resources, for example, is grossly inadequate: "Have a qualified biologist/botanist provide direct onsite input to, and monitor the construction contractor's compliance with mitigation stipulations in biologically sensitive areas." DEIS, p. 3-236.

species; (3) it must ensure that its activity does not result in the destruction of adverse modification of critical habitat of such species.

This burden envisions at least a good faith effort to conduct a biological assessment of Nebraska's biological resources. ESA, §7(c). Although EPTR Appendix 5 lists several Nebraska Game and Parks Commission documents as references, it is well-known that no comprehensive wildlife inventory is available in Nebraska and the Agency would have learned as much had it contacted the Nebraska Sierra Club or Audubon Society chapters, or made an honest inquiry of the Game and Parks Commission.[3] The Endangered Species Act prohibits any deployment unless and until adequate biological assessment is completed for Nebraska.

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B. The Agency has failed to perform its legal duties with regard to the Migratory Bird Treaty Act (MBTA).

1. The DEIS fails to discuss the MBTA and to fully disclose effects on migratory birds.

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The Migratory Bird Treaty Act, 16 U.S.C. § 03-711 (1976), hereinafter MBTA, combined with its enabling regulations, 50 C.F.R. §21, form a conservation program for the protection of migratory birds.

Migratory birds are plentiful throughout both the ROI and the ACS. EPTR, pp. 2-65 through 2-72. All of the identified and listed 27 species of waterfowl, 25 species of raptors, and 16 species of "special concern (EPTR Table 2.6.5-1), fall under the protection of MBTA. 50 C.F.R. §10.13. To bring the DEIS into compliance with the MBTA, research is needed to document more exactly number and species of migratory birds that reside in, pass through, and nest in the ROI before the effects of the proposed action can be adequately determined.

2. The DEIS permits environmental degradation in violation of the MBTA.

[3] In April 1982, Monica Kirk was advised by Commission personnel, in response to her letter dated March 20, 1982, that this information did not exist for Nebraska.

The DEIS fails to consider degradation of the avarian environment and the effect of such degradation upon the nesting and life-styles of the migratory birds in the ROI.

The 1972 convention with Japan[4] which was incorporated into the MBTA[5], states that the U.S. and Japan are bound to "take appropriate measures to preserve and enhance the environment of birds protected.[6] The Act clearly requires at a minimum that any planning activities which might adversely affect the avarian environment (such as road building, construction, transportation of hazardous materials) include provisions for every possible effort to avoid harm to habitat affirmative duty imposed on the Agency by the MBTA and NEPA to avoid degradation, which has been violated by failing to adequately consider migratory bird requirements.

1406

The MBTA has been used primarily to prosecute for violations of hunting regulations. In U.S. v. M.F.M.C., 572 F.2d 902 (2nd Cir. 1978) and U.S. v. Corbin, 444 F. Supp. 510, aff'd in part, 578 F2d 529 (4th Cir. 1978), the MBTA was extended to permit prosecution where a defendant's acts neither constituted a direct attempt nor demonstrated actual intent to harm migratory birds.

The Agency must obtain permits from the U.S. Fish and Wildlife Service before commencing any deployment activities within the ROI which would take, capture or result in the death of any migratory bird, or any part, nest, or egg of any migratory bird. See 16 U.S.C §704. At a minimum, consultation with and formal concurrence by the Department of the Interior is mandated if any habitat of migratory birds will be detrimentally altered as has been admitted by the Agency to be the case in this instance.

[4] Convention for the Protection of Migratory Birds and Birds in Danger of Extinction, and their Environment, March 4, 1972, U.S.-Japan, 25 U.S.T. 3329, T.I.A.S. No. 7990.

[5] Pub. Law No. 93-300, 88 Stat. 1980 (1974)

[6] Id. at Article VI

C. The Agency has failed to perform its legal duties with regard to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq., as amended.

The Federal Water Pollution Control Act (FWPCA), 33 U.S.C. §§1251 et seq., as amended, applies to Agency planning. The DEIS authorizes activities which will cause water pollution (EPTR §3.5; Table 3.5.3-1), including increased turbidity and degradation due to potential oil and chemical spills.

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The DEIS makes no reference to any quantitative pollution control standard imposed under federal or state law considered by the DEIS preparers. In the absence of consideration of such a standard, it must be presumed that activities under the DEIS carry the potential for violation of the standard.

In addition, no adequate monitoring program has been described which would yield data specific enough to determine whether the proposed activity proceeds in compliance with the standard, permitting water quality violations to go unprotected. See Part II, supra.

IV. THE DEIS FAILS TO PERFORM DUTIES REQUIRED BY STATE CONSERVATION LAW.

No reference whatsoever is made to the Nebraska conservation statutes and regulations administered by the Department of Environmental Control, hereinafter DEC. The references cited in the Appendix do not include any contact with most of state agencies charged with implementation of one state's resource management program. See Part V, infra. Such failure can only lead to the conclusion that the DEIS has not complied with state conservation law and that the proposed action carries the potential for violation if allowed to proceed.

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V. THE DEIS IS SO INADEQUATE AS TO PRECLUDE MEANINGFUL ANALYSIS. THE AGENCY SHOULD PREPARE AND CIRCULATE A REVISED DRAFT.

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40 C.F.R. §1502.9(a) requires that a revised DEIS shall be prepared where it is "...so inadequate as to preclude meaningful analysis... ." The DEIS is grossly inadequate as regards not only the description of impact on human and natural resources, but also in the interpretation of impact.

One basic problem with the DEIS is that it is too often too general, rather than specific, about the effects of MX construction. Impacts are described as "low", "moderate", or "high" without specific quantitative discussion of what these terms mean as regards each impacted resource. The actual effect of the MX on a given resource is thus never clear. Consistent failure to quantify effects renders an economic cost-benefit analysis infeasible.

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A second significant problem is that the mitigation measures are usually cursorily mentioned. Evaluation of the appropriateness or viability of suggested measures is impossible.

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Third, the Agency should have held scoping hearings in Scotts Bluff County, given the projected impact upon Scotts Bluff as a regional service center. The Agency's data gathering system was deficient because there may have been issued raised at the requested Scotts Bluff County scoping hearings, which the DEIS could have addressed.

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Finally, the impact of a Soviet attack on the MX missiles, the effects of possible accidents involving MX missiles, and the effects of MX security procedures upon the rights of citizens and residents in the deployment area are addressed nowhere throughout the document. This is a significant failure.

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Specific significant deficiencies identified by resource are discussed below.

A. Biological Resources

A fundamental flaw pervading the DEIS is the failure to adequately identify methodologies used or to "... make reference by footnote to the scientific and other sources relied upon for conclusions in the statement." 40 C.F.R. §1502.24. In addition to the inadequacies already enumerated, the Biological Resources Section of the DEIS fails to adequately address the following specific resource issues:

1. DEIS §2.2.2.1.2: The primary data source is inadequately disclosed. How many hours of helicopter flights/field surveys were conducted? During what time of day/what months of the year? How many hours were conducted in Nebraska specifically?

1409

2. DEIS §2.2.2.1.2.2: The secondary data sources for Nebraska are grossly inadequate. No environmental analysis documents, management or agency files, or university research files were disclosed in Appendix 5 as providing source material on Nebraska biota.

1415 Neither (a) the relevant principal public interest groups such as the Nebraska Chapters of the Sierra Club and Audubon Society nor (b) the relevant principal federal and state agencies such as the Nebraska Department of Environmental Control, Nebraska Department of Water Resources, Nebraska Natural Resources Commission, Nebraska Department of Agriculture and the Soil Conservation Service of the USDA were consulted.

3. DEIS §2.2.2.1.2.3: This exclusively qualitative evaluation inadequately identifies the existing environmental conditions. The data must be more quantitative, e.g., in how many Nebraska counties within the ROI were endangered or threatened species encountered? What quantitative methods of field study were employed? What is the size of the big game (§2.2.2.2.2.1), furbearers (§2.2.2.2.2.2), nongame mammal (§2.2.2.2.2.3), upland game (§2.2.2.2.4), waterfowl (§2.2.2.2.2.5), raptor (§2.2.2.2.2.6), other bird (§2.2.2.2.2.7) and reptile and amphibia populations (§2.2.2.2.2.8) within the ROI at this time? What is the projected wildlife population in 1990 under the "no action" "deferred action", or "proposed action" alternatives, respectively? The same questions apply to the fisheries (§2.2.2.2.3) and to the vegetation (§2.2.2.2.1) resources.

1410

4. DEIS §2.2.2.5: Upon what sources is the endangered and threatened species inventory for Nebraska ROI based? How many hours of helicopter flight field survey were conducted in Nebraska? How many people were involved and what are their qualifications? Were the Audubon annual bird count census data used?

1434

The primary "comprehensive" sources of information about the wildlife resource were a 1972 inventory of the Nebraska Game and Parks Commission supplemented by a 1976 report on Nebraska's Endangered species. Volume I of the 1972 inventory is no longer available to the public according to Commission personnel during a telephone conversation with Monica Eirk in October 1983.

5. DEIS §3.2.2.2 and §3.2.2.3: How reliable is the impact evaluation model used in the study? How extensively is this model reported in the literature? Is it suitable for use in assessing environmental impact of the proposed action (a project which will disturb an estimated 1560-1780 acres of land surface and will impact vegetation, wildlife and fisheries resources)? What are the respective strengths and weaknesses of this model? Why was it selected? What other models were available? What were those alternative models' strengths and weaknesses?

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6. DEIS §3.2.2.4: What source(s) will perform the "assumed" and "suggested" mitigations? What mitigation measures were discussed but discarded—and why?

1412

7. DEIS "no action" alternative: Identify the expected "current trends in human population-related impacts on the resource" that the DEIS alleges. Identify possible changes in agricultural and wildlife management philosophies which would impact the resources as alleged. Discuss the condition of the resource, based upon the "no action" projections referred to in the DEIS, in 1990.

1413

8. DEIS §3.2.2.4.1.2: What long-term and short-term soil erosion impacts are anticipated? How will this affect vegetation? How long will the riparian vegetation need to recover following disturbance? It is improper to conclude that the impact at the staging areas alternatives "...will be similar...[or] negligible," absent further detailed discussion. Furthermore, there is insufficient data to conclude that the impact at the cable paths and roads is "negligible."

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9. DEIS §3.2.2.4.2: What long-term and short-term soil erosion impacts are anticipated? How will this affect wildlife habitat? How long will the wildlife population require to recover? Upon what data is the finding of severity of impact based? What is the basis for the conclusion that impact on furbearer, upland game, waterfowl, nongame mammals, birds, reptiles, and amphibians in the ROI will be "low and not significant" in short-term and "negligible" in the long-term? What is the basis for the conclusion that project impact upon big game

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populations in the ROI will be "significant and moderate" in the short-term and "negligible" in the long-term? On what basis is it concluded that impact upon ROI raptors will be "significant and moderate" for the short-term and "significant and low" in the long-term?

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10. DEIS §3.2.2.4.4 and §3.2.2.4.5: What long-term and short-term soil erosion impacts are anticipated? How will this affect wildlife habitat vis-a-vis fisheries? How likely is it that significant short-term impacts, such as described, will cause permanent impairment? How long will the resource require to recover?

1396 1395

Quantify the projected turbidity and water quality changes due to sand and gravel removal and/or potential petroleum spills and flow alterations. Which of the fish species spawn in the impacted creeks? What is the reproductive cycle for each threatened or endangered species, such as the greenback cutthroat trout?

1394 1393 1397 1398

11. DEIS §3.2.2.5 and EPTR §3.6: What reputable biological authority is relied upon for employing an "aggregated level of impact" methodology? Please provide citations to the literature. Was this based on quantitative analysis? If so, please explain. If not, please explain.

1414

12. DEIS §3.2.2.6 and EPTR §3.7: What is the cost of each of the potential mitigation measures? Please describe each of the measures in detail.

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13. DEIS §3.2.2.7 and EPTR §3.8: Describe quantitatively the environmental consequences of the unavoidable adverse impacts listed, both direct and indirect.

1385

B. Geologic Resources

1. The Wheatland-Whalen Fault traverses the "T" flight area. Three silos (T-2, T-3, T-9) are on or near the actual fault line. While the safety section of the DEIS admits that shock (shaking) could be the cause of ignition within the silo (DEIS, p. 1-31), the Agency fails to discuss the impact of an earthquake, alleging that the chances of earthquakes are remote (DEIS, p. 3-234). The Agency, at a minimum, should have included analysis of alternatives deployment in flights not

1471 174

on or near the actual fault. Given recent seismic activity in Idaho, the placement of any nuclear or explosive material along a fault system requires serious examination and analysis which is not present in the DEIS. Finally, the Agency has failed to evaluate the environmental consequences of ignition due to all reasonable foreseeable causes, including shock.

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2. The Bordeaux-Gyannis-North Platte Fault is located about 60 miles northeast of the closest silo. There have been numerous small quakes associated with this fault. Because of the distance of the fault from the MX field reduces risk (ETPR p. 2-33), the Agency neither discusses the environmental impact nor explains the basis for the conclusion that seismic activity would not cause ignition.

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C. Noise

1. There is no basis for the Agency's conclusion that the noise level from construction activities and use of construction equipment will be no different from that of existing general construction activities.

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2. The Agency inadequately identifies, quantifies, and evaluates the impact of noise in the Nebraska deployment area. What will be the impact on wildlife in the Wildcat Hills State Recreation Area in Scotts Bluff County? How will the increase in noise affect domestic cattle? Rural residents?

1480

D. Air Quality

1. While the Agency correctly concludes that the particulate emissions will occur primarily from fugitive dust due to vehicular traffic on unpaved roads, the impact evaluation does not adequately consider the transportation-related impacts which are discussed in the Transportation section of the DEIS.

1484

2. The conclusion that a "negligible and not significant" impact vis-a-vis regional visibility with respect to construction of any of the alternative road access routes, staging area options, or cable road options lacks a quantitative basis.

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E. Water Resources

1294 The project will require a total of 449 AF of water at silos and 67 AF in Cheyenne. How does this compare with existing uses within the ROI, such as the average farm, the average ranch operation, and the rural cities of Kimball, Cheyenne, Harrisburg, Scottsbluff?

F. Public Finance

1. Only Kimball, Kimball County and Kimball School districts #1 and #3 are analyzed, due to Agency premise that only governmental units expected to receive 5% or more because population growth should be analyzed. However, the Socioeconomic Impact Study admitted that

581 regional resources (Panhandle Mental Health Center, Scotts Bluff Violence Task Force, etc.) will be affected. The impact of increased regional population on the governmental units which support these agencies should be addressed.

2. As regards the City of Kimball, city carryover funds (revenue/expenditure difference) will be $9,984 less than if no MX project were done during 1983-1992. Kimball will gain in 4 of the 10 years ($4,260 total) and will lose in 6 ($14,244 total). Biggest loss

389 year will be 1989, when carryover will be $11,539 less than if no action. (Note that 1989 is year of biggest MX activity in the area.) Are federal subsidies available to impacted rural cities and if so, in what amount?

3. The Agency concludes that it will be "...necessary (for Kimball County) to utilize surplus funds, but this will not result in a

415 revenue/expenditure imbalance." DEIS p. 3-60. The ETPR concludes that Kimball County will make money on the MX—$63,392 over the 10 year period. Which projection is accurate?

4. As regards mitigation of the impacts, the only suggestion offered is that contractors might build trailer parks for some of the

416 workers who move to Kimball, and that some (unnamed) public agency will be responsible for providing financial assistance for water supply, recreational facilities and water treatment. DEIS, pp. 3-73 to 3-74. This is a sorely inadequate response to "boom and bust" economics.

588 5. No federal impact aid is recommended for Nebraska—all is designated for Cheyenne and Laramie County. Socioeconomic ETPR, p.3-49

G. Social Well-being

1. The psychological impacts of MX deployment in rural Nebraska due to the significant interruption of the rural communities are not adequately addressed, although the inevitable increase in human population stress due to the increase in transient population and lack of basic services is superficially noted. For instance, the Agency projects an increase in substance abuse and domestic violence. However, the Agency should directly address the psychological impact of:

-living at "Ground Zero"?

40 -working on such a destructive system (particularly for a person who may have ethical qualms, but needs the job)?

-living through the stress of a boom and bust cycle, with all of its accompanying problems, in one's home town?

-being dislocated from one's family home because of the danger of an accident?

-living with a prominent, and increasing, military presence in one's local community? (i.e., how does it feel to have lots of guys with guns around)?

-being uncertain what future effects on civil liberties living near the MX may have?

2. The impact of the dislocation of ranchers in the Quantity Distance Zones near the launch facility is rated low and short-term because the Agency has offered to provide the displaced with resources

184 should they choose to move. What is the basis for this conclusion? Has the Agency considered the long-term psychological impacts upon people who possess a special relationship to the land, such as the multiple-generation farm and ranch families slated for displacement? Will more people need to be dislocated in the future? Has the impact of the psychological uncertainty upon other rural families been evaluated?

565 3. Kimball County has a population of 4482 people. While the average per capita income is consistently above the state average, the percentage of people below poverty level also exceeds the state average: there are some very wealthy people and as many very poor people. The crime rate, although increasing (the crime rate index rose from 37.3% in 1981 to 50.7% in 1982), is still below the state average. The County is proud of its community spirit, cleanliness, recreational opportunities, and volunteerism. Kimball looks forward to the economic growth that allegedly will accompany the construction of the MX, but worry about substance abuse, domestic violence, and other social problems related to transients. How will these impacts be mitigated?

495 4. Although a population increase of at least 5% is projected for Kimball County during at least one year of the project, causing changes "...that will affect both subgroups and community function...", the Agency concludes that "...major structural changes in the area's social make-up are not anticipated." DEIS §3.1.5.1. The Agency should explain the basis for this presumptively inconsistent conclusion.

494 5. Although income and the standard of living will rise for some residents, the poverty population will not benefit from the economic advantages of the proposed action. A thorough discussion of the anticipated problems which will foreseeably arise from an increasingly disproportionate distribution of financial resources is needed. What mitigative effects are offered?

415 6. The projected increase in public services, due to an increased tax base, contradicts the Revenues and Expenditures Summary for no action alternative in the Public Finance Section. DEIS Table 3.1.3.1, 3-30 and Table 3.1.3.2, p. 3-40. A comparison of the annual projected balances from 1982-1992 reveals that deployment as proposed will result in a net loss of $9984 (1982 constant dollars) for the City of Kimball. The projected "beneficial impact" is simply non-existent.

462 7. While the aging, declining population could benefit from increased diversity and social activity, the new "young adults" may have difficulty assimilating into a small rural community because of limited social, entertainment, and recreational opportunities (DEIS p. 3-86):

a. Increased substance abuse—which will foreseeably increase traffic violations (DEIS, p. 2-87);

462 b. Increased domestic violence because of the lack of social opportunities (DEIS, p. 3-87);

c. There are few existing human services available in Kimball County (DEIS, p. 3-87);

d. Conflicts with the surplus job-seekers, many of whom will be unskilled and without sufficient means.

The mitigative measures outlined in the DEIS envision major educational and outreach programs. However, the fact that almost all of the mitigative efforts will be implemented by volunteers and public agencies (the lack of agencies to implement them being a recurring theme

555 throughout the DEIS) renders them meaningless. Furthermore, President Reagan's "spirit of volunteerism" has already mobilized the efforts of the local volunteer organizations, all of which are overextended. Finally, implementation of any single measure will be costly and the

587 DEIS fails to identify who will pay. The local rural communities must not be solely responsible for absorbing the expense.

B. Housing

331 1. The DEIS ignores the issue of housing for the expected influx of poor transients, who unsuccessfully seek MX work. Since presently

581 Kimball County does not provide most human services—residents must travel outside the county or do without most services (DEIS 3.1.5.4.2.2)—this problem is also a concern for agencies in Scottsbluff and Scotts Bluff serving Kimball County residents.

2. The increased rental and sales values (during the growth

494 cycle) is identified as a possible benefit of the proposed action. The DEIS improperly fails to address the adverse impact upon that large percentage of Kimball County residents below poverty level and the problems certain to ensue with the increased financial disparity.

332 3. Mitigation measures are too speculative.

I. Public Services and Facilities

508 1. The restriction of impact assessment to governmental areas with projected five percent increase in population is arbitrary. As regards Nebraska, the cities of Scottsbluff, Gering and Sidney are within the ROI and the entire Panhandle, which includes Harrison, Hemingford, Alliance, Crawford, Gordon, Bridgeport, Melbeta, McGrew, Morrill, Sidney, Dix, Chappell, Broadwater are designated within the ROI in some instances and impact assessments included.

509 2. The single Nebraska city which met the criterion of five percent increase was Kimball. The conclusions drawn regarding impact on education, law enforcement, criminal justice, fire protection, health care, human services, and libraries lack a scientific basis. In the discussion of human services, the DEIS mistakenly identifies an employee position which is no longer staffed by the Panhandle Mental Health Center. The section also fails to mention impacts and mitigation measures regarding alcohol abuse by commuters, transients, and excess job seekers.

510 3. Land Use

1102 1. Population influx is expected in Scotts Bluff County and the Agency has designated Scotts Bluff County as within the ROI for rural land use. Why was Scotts Bluff County not within the ROI for urban land use?

1103 2. The cities of Sidney, Dix, Harrisburg, Scottsbluff, Morrill are towns in the ROI which will be affected. The Agency's decision to limit the impact determination to the City of Kimball was error.

1104 3. The "analytic methods" are inadequately disclosed. The "local officials" with whom the Agency spoke to determine land use trends for urban areas should have been disclosed. The specific factors considered should also have been disclosed. The PRC report which served as the basis for the Agency's analysis of present developed land use in

1105 Kimball is 7 years old and outdated. The methodology used by the PRC is not disclosed.

1107 4. No land use analysis was conducted as regards modification at launch sites. The Agency must identify the short-term land use impact of the safety hazards and the short-term land use impact of incidental use of roadways, etc. during modification.

1177 5. The area concentrated study regarding recreational impact (regional recreation) includes only counties in Wyoming. The designated 150 mile radius for the ROI is arbitrary and fails to consider the impact upon residents of cities other than Cheyenne even though the Agency states people will live in other places.

213 6. The Agency erred in failing to make population projections for cities/towns besides Kimball. Similar baseline studies should have been performed for other towns in the areas, particularly Scottsbluff, Gering and Sidney, which are likely to experience a baseline population growth in the 1980's.

1106 7. The proposed action will require 11 acres of land in Kimball for mobile home sites and nonresidential use. Will this area be available through the market, or will condemnation proceedings be necessary?

1140 8. The impact of cable laying operations upon farming and
1139 grazing schedules and, secondarily, upon compaction of soil was not
1461 identified as a long-term impact. Discuss the long-term impact of maintenance and security issues upon mineral exploration, soil compaction and sod disturbance, and erosion.

1115 9. The Agency failed to analyze how increase in water useage will affect land use and development potential.

1142 10. An indirect impact on land use which could affect implement and livestock movement, if restricted or prohibited, is launch facility site and road modifications. This was neither disclosed nor evaluated. What is the short-term impact due to interruption in farming and ranching caused by these modifications?

185 11. The Agency admits that the 1,750 Distance Quantity Zone around each silo is an estimate and that the exact size of the Zone

185 won't be known until testing in 1984. How many families will really be displaced? Can the Agency guarantee that no additional land will be used or restricted because of deployment of the MX? If not, why not? What are all the foreseeable impacts?

190 12. The Distance Quantity Zone from a silo to a public road has been increased from 720 feet to 1,050 feet. The Agency admits that the present 720 feet is not observed in many cases. If so, why do these requirements exist? The Agency anticipates similar exemptions for the proposed action. Who grants the exemption? What risks are considered in making the decision whether to grant the exemption?

1140 13. The proposed action includes easements for at least four cable routes, involving a minimum of 127 acres. How long will land underlying the easement be out of production? Will landowners be compensated during construction activities? Will routine maintenance procedures affect land in production? If so, during what times of the year? Will landowners be compensated accordingly? How will the amount of compensation be determined?

165 14. Identify the hazards involved in the staging process. Do any local Kimball ordinances prohibit land use of this type in cases where these types of hazards foreseeably exist?

143 15. The Agency fails to include a consideration of the impacts of security-related activity, safety hazards (explosions), radiation, or

163 accidental detonation of the MX.

1133 16. The rural land use analysis was based primarily on satellite photographs. Does this method adequately identify temporary or sporatic uses (recreational hunting, fishing, etc.) and the MX impact on this type of use?

1159 17. The definition of "recreational use" is arbitrary and fails to take into consideration activities such as sightseeing, nature studies, or aesthetics.

1160 18. Since Nebraska's Lake McConaughy was identified as having the highest percentage of out-of-state visitors, it should have been included in the ROI and impact evaluated accordingly.

1141 19. The figures used to value acres of irrigated cropland ($34.15), dry cropland ($11.40) and rangeland ($4.95) are inaccurate fair market values in Nebraska.

1462 20. The Agency claims that the proposed action will minimize solely erosion and the surface will be returned to its "approximately original condition." How is this term defined and how will it be measured?

E. Cultural and Paleontological Resources

1248 1. The extent of impact on cultural and paleontological resources has not been accurately assessed because so many sites as yet unidentified, but which most probably exist based upon an extrapolation of existing data and land characteristics have been ignored.

1267 2. The assessment of pre-historic, historic, and American Indian cultural resources affected by the proposed action is superficial. No Indian Nations were contacted notwithstanding the existence of Indian burial sites within the Wyoming deployment area.

480 3. No assessment of the impact upon present-day culture of the Hispanic and Caucasian inhabitants of the ROI was included.

1272 4. Since the proposed action would result in irreversible adverse impacts to cultural and paleontological resources, the DEIS incorrectly characterizes the impact as "low."

1. Transportation

984 1. The proposed action involves transportation of the MX in four separate parts on a "stage transporter" which is 100,000 pounds heavier, 12 feet longer, and a foot higher than the Minuteman transporter erector. The actual cost of improving and maintaining state and county roads during and after deployment was not included. Who is responsible for paying these costs?

166 2. "Transportation" is defined as "... the safe and efficient movement of persons and goods." DEIS 2-52. The transportation of the "goods" of the proposed action--the MX missiles--is not discussed and and the impacts accordingly not evaluated. The Agency failed to discuss

hazards caused by use of roads by Agency personnel once deployment is completed. What restrictions on road use will be imposed upon citizens when the MX are being transported? What safety precautions will be imposed by the Agency upon its own personnel and upon the residents when the MX is being transported? Are there new restrictions to be imposed, which are not presently enforced under the Minuteman III, once the MX is in place?

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3. The Agency rates the impact on use of rural roadways during construction as "low and not significant." This projection is based upon studies of urban, rather than rural, traffic patterns and is inappropriate in this context: 500 percent to 1300 percent increases in rural traffic can not truthfully be rated "low and not significant" in impact! Why were urban standards used? What would be the impact ratings if appropriate rural standards were employed? Why are time estimates for road closures and traffic delays due to widening, resurfacing and bridge construction not specified and considered in assessing impacts in Kimball and Banner counties (where 167 miles of roads must be resurfaced)?

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M. Energy

1. The Agency projects construction of 10KD substation in Kimball accompanied by six miles of new power line. ETPR 3-12. Although there is no projection of a "net population growth" for Kimball, the Agency projects a 50 percent increase in electrical consumption (EPTR 3-12), although the MX will increase consumption only 1.3 percent (ETR 3-17). How this inconsistency resolved? If the consumption will increase only marginally (1.3 percent), why must a substation be built? Who will pay for the substation, now in construction but maintenance? Who will use the 50 percent additional electricity? Who will pay for the increased electrical consumption by the MX?

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2. The Agency anticipates the "raising of some power lines" due to the taller stage transporter. DEIS, p. 3-147. Do the power lines need to be moved or not? If so, this a reasonably foreseeable activity and a full impact analysis should have been included.

129

N. Utilities

1. Again, the data source is inadequate. No primary data were collected in Nebraska. The local public officials consulted with regard to water, wastewater and solid waste, legal controls and legal requirements regarding facility construction should have been identified as well as the amount of time spent in consultation with them.

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2. Although the ACS includes Goring, Scottsbluff and Kimball, the Agency fails to identify existing water treatment and distribution systems and/or impact of the proposed action in these cities.

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O. Recreation

This section used a narrow definition of recreational activities and recreational sites. These narrow definitions therefore limit the scope of the section, so that it is not nearly as comprehensive as it should be. Impact of local communities and their ability to respond to day-to-day recreational needs of project associated population is not satisfactorily addressed. Specific concerns are noted below:

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1. DEIS §2.1.11.2.2.2: This section includes the public library as a provider of recreational programming and/or facilities. A library, however, is not included in the definition of local recreation in 2.1.11.1.2.2.

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2. §3.1.11.4: For the regional recreation analysis, existing levels of use at recreational areas are assumed to continue under the No Action scenario. Why can this assumption be made?

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The data unit inconsistencies (activity-days vs. visitor-days) referred to are not defined.

1164

It was also assumed that the immigrant population will participate in recreational activities at the existing per capita rate. Again, how and why can this be assumed?

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3. DEIS §3.1.11.3.1.2: It is indicated that increases will have a low, not significant impact on the quality of the recreational experience, since many of the developed areas are below capacity much of the year. If the level of impact and significance is averaged over the year, what about the impact and significance at peak times of the year?

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Reporting of the data is inconsistent. Usually, percentages are used. However, there are times when the term "activity-days" is used without defining it or putting it in perspective with the percentages that are more often used.

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4. DEIS §3.1.11.4.2.2: The Kimball area appears to be understudied, even though assessment of impact is made for the area.

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5. DEIS §3.1.11.4.3: It is stated that because staging areas, roads, and cable system routes do not affect parkland or recreational facilities, no impacts are anticipated. This statement is certainly based on the faulty assumption that people recreate only in designated parks or recreational facilities. Secondly, routes to those designated parks or facilities could be affected, and that is not addressed.

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6. DEIS §3.1.11.52: Were local data for the Kimball area (or others) really available?

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P. Employment Demand

This Section was written in such a way that it is render difficult for the reader to understand exactly what is being said. For example, some discussion and tables portray the region while others portray the concentrated area of study. This is not always clearly stated in the discussion or table titles, and therefore leads confusion to the reader. More generally, the section does not seem to flow logically from

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background to presentation of data to conclusions or summaries. It reads in a disjointed fashion and leaves the reader wondering what was really said, and if there is actually a basis for what was said.

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1. DEIS §2.1.1.1: The Region of Influence is dilineated on the basis of a 60-mile radius surrounding F.E. Warren AFB. Why, then, is Denver included in the Region of Influence?

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2. DEIS §2.1.1.2: Regional employment grew at an annual growth rate of 5.7% between 1970 and 1980. How does this compare to the growth rate in population and employable persons?

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The growth in the Labor Force Participation Rate from '70 to '80 for the nation is attributed to the increased number of women who have entered the labor force. What is the documentation for this statement, and what are the other possible factors to which the growth might be attributed?

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3. DEIS §3.1.1.4.1: Why look at unemployment rates for the region, when the area of concentrated study is the area of concern regarding local labor and immigration?

217

4. DEIS §3.1.1.4.2: Why, again, is available labor of the region considered instead of the concentration area of study?

5. DEIS §3.1.1.6: The mitigation measures are generally stated, and the issue of how such measures can be taken is not addressed.

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6. DEIS §3.1.1.7: This section, as important as it is, is covered too briefly.

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7. DEIS §3.1.1.5: Because of the low long term impact and the considerable immigration that will occur. The actual effect will be non-beneficial to the area of concentrated study if the statement in §3.1.1.1 is considered:

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> The generation of employment demand, and the resulting employment of labor and increased personal income is desirable, and therefore considered to be a beneficial effect.

VI. THE PROPOSED ACTION IS NONMERITORIOUS AND DEPLOYMENT SHOULD NOT ENSUE.

20 C.F.R. 1503.3(a) permits comments which "... address either the adequacy of the (impact) statement or the merits of the alternatives discussed or both." The issue of whether a need truly exists for this new weapons system sufficient to justify the adverse environmental impacts has been discussed by the public, was properly raised at the scoping hearings, and has been improperly ignored by the Agency.

Attached please find a report (Exhibit A) prepared by LABAC which discusses the merits of the Peacekeeper alternative and to which the Agency should now respond. The arguments advanced are, in sum:

1. The issue of nuclear inferiority is a red herring: there is no "missile" or "bomber" gap.

2. The MX is a distabilizing weapon system and will increase the danger of nuclear war.

3. Negotiation and agreement, such as an Anti-Ballistic Missile (ABM) Treaty, Comprehensive Test Ban negotiations, START and INF talks, and a mutual, verifiable FREEZE, are truly "peacekeepers."

Respectfully submitted,

NEBRASKANS OPPOSED TO THE MX (NO MX)

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This document contained the following attachment:

Lawyers Alliance for Nuclear Arms Control Inc., "The Case Against the MX Missile," Boston, MA, 1983.

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Nebraskans for Peace
430 South 16th Street
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402 475-4620
A Chapter of Clergy and Laity Concerned

Re: MX DEIS

November 23, 1983

Major Peter Walsh
Director, Environmental Planning Division (DEV)
Department of Air Force
AFRCE BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

The environmental impact statement begins with a reference to the assumption of the Scowcroft Report indicating that a missile having low maintenance cost, high reliability, rapid response and great accuracy (1-5) make it imperative that the U.S. land-based system be upgraded to meet Soviet challenges. Such a simplification of the Scowcroft argument ignores the Congressional Research Service's indication that the best present land-based U.S. missiles possess a lethality approximately equal to that of the best Soviet missiles (33.5 to 32.1)[1] and that the MX will possess a lethality six times greater than that of the best Russian weapons (192.9 to 32.1).[2]

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Since this is the case, overwhelming national interest cannot be argued as the basis for securing the consent of the two involved states to skirt the usual environmental impact procedures employing a more formal process than that on which the present document is based. We question the propriety or even the legality of such a procedure.

It is further inappropriate to detach the analysis of the environmental impact of the installation of the MX in Minuteman silos from the analysis of possible impacts of superhardening, deep-burning, and anti-ballistic missile defense. Since the MX is an extraordinarily accurate weapon which has been described by American and neutral experts as a first-strike weapon, it is likely also to be perceived as such by the Soviets. The MX is being put in place without any defense system; and in earlier testimony concerning the MX before the Scowcroft Report was issued, Secretary Weinberger testified that he opposed the Minuteman silo MX basing because it was vulnerable to attack. Senator Exon of the Senate Armed Services Committee has also argued the same thing, and he has heard all of the Senate testimony on the matter.

35

If the weapon is vulnerable and if the Soviets see it as a first-strike weapon of extraordinary accuracy and danger to them, then their best response against an undefended system would, in time of crisis, be to knock it out. Since such a threat exists, an ABM system, superhardening and perhaps deep basing will almost certainly follow. This was the opinion of Admiral Carroll when he visited Nebraska recently; funds for research into such a system have been provided by the Congress. It is inappropriate to separate the first

MX-in-Minuteman silos stage in the environmental impact analysis from any possible later stages in view of the fact that, once the MX is installed without defense, the populace of Nebraska will be captive to efforts to install a defense system.

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They will be coerced to accept the environmental and socio-economic consequences of an ABM system which will take much of their land and property from them in the interests of protecting their lives. Unless no ABM system is contemplated at anytime in the future, fairness requires that all stages in the installation be considered at the same time to permit a fair environmental hearing on all stages of the plan. Such a procedure would preclude the element of coercion in testimony on later stages, and in DOD efforts to secure Western Nebraska's property. The Defense Department's posture toward the property owners in Western Nebraska affected by the first stage, MX-in-Minuteman installations, confronted them and their state governments with unforeseen environmental impacts after important planning had taken place and forced them to accept a fait accompli.

In the Scowcroft Report, the MX is treated as a temporary measure to be relied upon until mobile, single warhead missiles can be developed. If that is the case, then the environmental statement should also treat the environmental and socio-economic effects of the removal of the silos.

Finally, we feel that the estimate of possible hazard from human error described on pp. I-30 and I-31 minimizes the hazard unduly. Similar kinds of statistics have, in the past, been suggested for nuclear power plants which have had a number of "million-to-one" accidents.

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Sincerely,

Betty Olson, Coordinator

[1]Jonathan Medalia, "Intercontinental Ballistic Missile Program," Congressional Research Office, 5/27/83, p.3.

[2]Ibid.

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Nebraskans for Peace

420 South 16th Street
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A Chapter of Clergy and Laity Concerned

10/13/83

AFRCE-BMS-Dev.
Attention Major Torgerson
Building 520 Room 122
Norton Air Force Base, Ca. 92409

Dear Major Torgerson:

Enclosed is a list of concerns which Nebraskans for Peace has regarding the Socio-Economic Impact Statement for the MX missile. We submit these for your serious consideration.

Sincerely Yours,

Betty Olson
Coordinator

[illegible]

70

[illegible] the report dollar figures are given for the potential increases to [illegible]. An attempt is made to translate these figures into probable tax base given current rates -- which would present a lower but more relevant [illegible]. It is as though an attempt were being made to dazzle a bunch of hicks with the prospect of sudden wealth. However, Nebraska's farmers are [illegible] in their own right and know perfectly well that it is net, rather than gross, income which is significant. The bias of the report is shown

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in the fact that the figures are the probable cost of the project given dollar figures, as is being presented as a sum total. It is difficult to compare the increase in the estimated tax base with isolated suggestions that increased [illegible] facilities, housing, sewage and teachers will be needed. A fairer presentation would have struck a balance.

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II. The report operates largely on the assumption that all will go according to plans. More disturbing, and unrealistic, is the assumption that only the number of workers needed for the project will come to the area. Those writing the report are aware that this is normally fallacious and as a matter of fact suggest that a [illegible] is brought in [illegible] by means of advertising. They [illegible] it is not by any [illegible] to pay for this and how effective it is [illegible] with the present state of the economy. It is true that [illegible] have improved but great studies of the situation have [illegible] in part to suppress having less desirable pair

[illegible] part.

time jobs. What would be the impact on the local welfare case load if workers seeking jobs came to the Panhandle area the way they do to Texas? Should not the report contain an estimate cost for the increased burden if, say, 5% more [illegible] the area to unskilled active seeking jobs? Further, the study suggests

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that much of the work will be seasonal. A suggestion is made that labor market friction[illegible] -- i.e., people outer-facets ----- could be avoided if college students could be recruited for this work. If they cannot (and again there is no clear suggestion as to how this could be accomplished and who would pay for it), what would be the likely wintertime increase in the unemployment rate?

III. The computer model for the location of the immigrant population uses a gravity model which seems to postulate essentially that the workers will seek the nearest large town. This seems reasonable, if and only if the

310

workers bring their families. The record suggests that many may not and the nature of the work suggests that many will be young single men. "Right not these men, intending to stay for the most part no longer than a year prefer to live as close to their work as possible? And in that case might not some of the tiny [illegible]s suddenly find themselves with mobile home parks? What would the impact of such a trailer park be on a town such as Henry or Whestland?

IV. The report states that studies have shown no clear direct relationship

1454

between an increase in population and an increase in game law violations and hence no additional game warden resources will be needed. The data can be looked at in the reverse fashion to show that no such relationship has been disproved and is it not likely that if a large number of young men find themselves unemployed during the fall and winter that they will be tempted to take what game they can find.

V. Many of the roads and bridges, etc will need to be improved for the

1092

transport of the missiles. At what period of the year is this most likely to occur and how likely is it that individual farmers will find that the roads they need to bring their goods to market are blocked when most needed?

VI. Most military operations and most peaceful uses of nuclear power are accompanied by analysis of the effects of a worst case scenario. Nine farmers in the impacted area are going to be forced to sell their homes due to the danger of the MX's solid fuel blowing up. What would be the effect of a

178 serious accident during transportation or to the missile transporter/emplacement? What would happen, for example, in the unlikely event that a cropdusting plane crashed into one of these things? What would the clean-up cost be? And the possible long term effects?

VII. The tempting suggestion that the local youth can participate in the temporarily expanded job market if given proper training is made. What skills would be needed? If these skills are not currently taught in the local schools

313 may this not reflect the fact that there is ordinarily no market for them in that area and might not youth who have been taught these specialized skills seek to utilize them out of state when the construction phase of the project is completed?

VIII. The study portrays the immigrants as filling up the vacancies in the local housing market and overflowing into mobile home parks. But in fact many of

388 the immigrants will be much more highly paid than the local population. Is this not likely to raise the rents for the better housing and, depending on landlord's decision, force part of the local population into the trailer parks? What happened to rents during the initial construction of the Minuteman silos?

IX. The study reports that there will be great increases in vehicular traffic

822 and construction is an inherently hazardous occupation. Therefore is there a disclosure of the probable cost of having this increase in accidents,

[illegible]

1078 [illegible]

TESTIMONY FROM CHEYENNE, WYOMING PUBLIC HEARING

REFER TO PAGE 6.2-375

Oliver Reservoir Project

"Save The Lake"

November 7, 1983

P. O. Box
Kimball, Nebraska 69145
308-235-

AFRCE-BMS/DEV
Norton AFB
California 92409

RE: Oliver Recreation Area

TO WHOM IT MAY CONCERN:

At the public hearings held in Kimball last week, November 4, I tried to explain our concern in regard to additional people in the area using the recreation facility. The representative of U. S. - Berger explained that they were aware of the situation and would monitor the impact and use of the facility as time goes along. This just cannot be done scientifically without a great deal of time spent in doing so. There would be virtually no way to ascertain who was connected with the installation of the MX and who wasn't without asking each one of them as they entered. Just to go through and check licenses plates for out-of-state residents would be fruitless as the facility is within 15 miles of the Wyoming-Nebraska state line.

This project is most unusual as it is supported by hundreds and hundreds of volunteer people who go to the area, clean up the trash, build boat ramps and all of the rest of the facilities including planting trees, trimming and taking care of them and all things that go with a water based recreation area, and the tax support comes from our local South Platte Natural Resources District which is Kimball County, Cheyenne County and Deuel County, and they do not have the funds to maintain it properly for public use, and consequently the people around this area see to it that the work gets done on a volunteer and donation basis. Just twenty or thirty more people using the facility causes that much more trash to be picked up and more work and wear on the facilities. It doesn't take hundreds to affect this small project.

We are eager to see to it that the general public uses and enjoys all of the facility. That's why we built it and worked so hard on it. We want all of the people, MX or sub-contractors or military, tourists and all outdoor people to enjoy it, and we simply can't wait until the influx starts using it to have some monetary help so that would be too late. We are diligently working on the project now and have been all through the last few years making plans and getting things done that need to be done for outdoor recreation enjoyment. For instance, we have to depend on volunteer donations to get regular trailer-owners out there to keep the weeds down so people can have a decent place to camp, because we do not have the funds to buy the equipment needed. You can't wait until the weeds are five feet tall in the middle of July to try to decide if you can buy, borrow, get donated or whatever

AFRCE-BMS/DEV
November 7, 1983
Page - 2

1180 a owner to clean up the area. We need to know just as soon as decisions can be made if we can have some monetary help in keeping this place up and keeping it nice for everyone.

We repeat that we want everyone to use it, and we firmly feel that it will make life better and more pleasant and give somebody some enjoyment who will be coming into this area and working on the MX project whether they be sub-contractors or military.

Very truly yours,

M. J. Batterton

MJB:mv

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TESTIMONY FROM
KIMBALL, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-464

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TESTIMONY FROM
KIMBALL, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-461

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TESTIMONY FROM
CHEYENNE, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-343

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TESTIMONY FROM
CHEYENNE, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-367

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TESTIMONY FROM
KIMBALL, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-455

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TESTIMONY FROM
HARRISBURG, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-432

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TESTIMONY FROM
CHEYENNE, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-379

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TESTIMONY FROM
CHEYENNE, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-371

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TESTIMONY FROM

HARRISBURG, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-435

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COMMITTEE FOR A SANE NUCLEAR POLICY

November 23, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, California 92409

Dear Major Walsh:

I am writing on behalf of SANE to submit comments on the Draft Environmental Impact Statement for the MX missile. SANE is a national citizen's organization of 75,000 members which is working for a responsible defense policy. Therefore, we regard the DEIS as an extremely important document since it describes both the United States' defense posture and the government's attitude toward the direct impact of its defense policies upon its citizens.

I look forward to receiving your response. Thank you very much.

Sincerely,

Daniel Horner

Daniel Horner

DH/ab
encl

BOARD OF DIRECTORS

711 G STREET, SOUTHEAST, WASHINGTON, D.C. 20003 PHONE: (202) 546-7100

COMMITTEE FOR A SANE NUCLEAR POLICY

BOARD OF DIRECTORS

The Air Force's Draft Environmental Impact Statement: Peacekeeper in Minuteman Silos attempts to address the question of the repercussions of deployment of the MX missile. However, it fails to address adequately the concerns of citizens about the project. The document suffers from two fundamental flaws in its approach. First, the Air Force bases its DEIS on several assumptions about the MX that are unfounded, contradictory, or patently false. Second, the report uses an evaluation scale that is arbitrary and at times deceptive.

Throughout the report the Air Force fails to acknowledge that the project involves special considerations because the MX is a weapons system and not a dam, an office building, or some other "ordinary" project. Such concerns were voiced by citizens during the scoping process, but the report brushes them aside with the following statement: "Some felt that the environmental impact of a nuclear attack, particularly in the Deployment Area, ought to be included in the EIS. The effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operations"(1-6). This statement is nothing short of shocking. The effects of war are most certainly not speculative. The devastation and suffering of war are well documented. Perhaps the statement is referring specifically to nuclear war of the type that would involve an attack on the MX silos. But the effects of atomic warfare are also well documented in reports and studies of Hiroshima and Nagasaki after those two cities were destroyed by the first atomic bombs. An attack on the MX deployment area would involve weapons

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-2-

many times more destructive than those used on Hiroshima and Nagasaki. Thankfully, such weapons have never been used, and in that sense their effects are speculative. But clearly the destruction and suffering wrought by such weapons would be exponentially greater than the incredible levels at Hiroshima and Nagasaki. Nuclear weapons experts across the political spectrum agree upon this point. Thus, the Air Force's statement that "the effects of war are speculative" is both puzzling and immensely frightening. Moreover, the Air Force's refusal to discuss the possibility of a nuclear attack upon Warren Air Force Base in the DEIS constitutes an egregious evasion of the responsibility that it supposedly is addressing by means of the document. It is precisely because of the special characteristics of the project as a nuclear weapons system, and the resulting dangers that it imposes upon the community, that the project has caused such concern among citizens in the deployment area. The Air Force is obliged to address these legitimate concerns.

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The Air Force also fails to justify the very need for the MX. Its arguments are riddled with inconsistencies and inaccuracies. For example, the DEIS contains the following statement:

> If no Peacekeeper alternative is provided, the present Minuteman would be retained. Our ability to hold adversary hard targets at risk would continue to diminish. Abandoning Peacekeeper at this time in search of a substitute would jeopardize, not enhance, the likelihood of reaching a stabilizing and equitable arms control agreement with the Soviets. (D-14)

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The fact is that the MX will lead to instability, not stability. By replacing the Minuteman with the more lethal and accurate MX, the United States is presenting the Soviets with a more inviting target, and thus increasing the chances of bringing on a nuclear exchange. This is especially true because the purpose of the MX, as the DEIS admits, is "to hold adversary hard targets at risk." In other words, the MX is designed

to hit Soviet missile silos. Since it would be pointless to strike empty silos--that is, after the Soviets had already fired their missiles--the MX would be useful only if it were used for a preemptive first strike. The Soviets would then have a strong incentive to strike first so as to prevent an attack on their own missiles. Such a situation is extremely destabilizing. It makes nuclear war much more
39 likely since each side will feel compelled to fire its missiles first so that they will not be destroyed in their silos by an attack from the other side. Thus, the MX is clearly designed to be used first, contradicting the DEIS's claim that "[t]he U.S. has selected and sized its forces so as to enhance deterrence, not to achieve a disarming first-strike capability" (D-13).

Another inaccurate statement is the following: "Deployment of Peacekeeper is essential to our national security and provides incentive to the Soviets to negotiate equitable, verifiable agreements at reduced levels" (D-13). Deployment
125 of the MX will not lead to an agreement: this "bargaining chip" theory violates both history and common sense. Both MIRV's and cruise missiles began as bargaining chips: now both are employed by the thousands by the U.S., and the Soviets have corresponding programs.

Another troubling aspect of the DEIS is its treatment of the question of ballistic missile defenses and superhardening of silos. The report speaks enthusiastically of the prospects for superhardening technology (D-14) and of "[m]inor electronic and power improvements...being made to
35 integrate the new missile into the existing system and to achieve post-attack survivability"(D-15). Yet it repeatedly offers assurances that no superhardening of Minuteman silos will take place as part of the MX deployment (D-15, 1-5, 1-6). Such reassurances are most welcome, for any ballistic missile defenses or superhardening would violate provisions of SALT

which both the U.S. and the Soviet Union are observing. Moreover, the entire DEIS has been written under the assumption that no such construction will take place, since
35 environmental consequences would be much more severe if it did. Thus, the Air Force should be prepared to guarantee that no such construction will take place, or at least that any such construction would require a new DEIS.

Another point at which the report ignores the special concerns that must be taken into account when discussing a weapons system such as the MX is the section on the modifications in the Launch Control Centers. After these modifications "each Launch Control Center will be capable of monitoring any of the Peacekeeper Missiles" (1-21).
56 The DEIS addresses only the questions of what modifications will be necessary to bring about this result, paying no attention to the larger implications of this change--that is, the concern that such a modification increases the chances of an accidental launch--and does not offer any explanation of why such a modification is necessary.

The second basic problem with the DEIS lies in its method of evaluation. The document describes its approach in the following manner:

> First, the level of impact intensity was predicted at the site, local and regional level. Second, a professional judgment was rendered on whether the impact, in its context, was significant...["significant"] may indicate a judgment regarding which impacts warrant heightened attention by the Air Force or others, during project planning. (1-1)

36 Such a system is utterly arbitrary. The criterion for significance is not the severity of the impact on the environment, but rather the degree to which the Air Force is concerned about the impact. The possibility for manipulation with this scale becomes evident in the section which discusses cultural and paleontological resources. First, the Air Force is required "to assess adverse effects only for cultural resources that have been determined to be eligible to the National Register of Historic Places" (3-199). Second,

and more disturbing, there is the tendency of the DEIS to brush aside findings as insignificant. For example, the document notes that "a recently completed archaeological inventory of the base recorded eight prehistoric sites within a relatively small area; therefore, it is concluded that virtually any ground-disturbing activity has the potential for encountering additional prehistoric remains" (3-201). Furthermore, in its discussion of the impact of
36 the MX deployment on historical cultural resources, the DEIS notes that "there is a high likelihood of encountering buried historic archaeological remains along proposed utilities corridors" (3-204). But in spite of these and other such impacts, the cultural resources summary impact matrix shows no significant impacts, a conclusion which must make one question the validity of the significance criteria. In its defense the DEIS says that "these impacts have been rated as not significant because it is assumed that the Air Force will develop and implement a compre-
38 hensive management plan that will provide for mitigation of impacts to Register-eligible cultural sites in accordance with current regulatory statutes and guidelines" (3-204). Yet this assurance makes no mention of who will monitor the Air Force's plan. It offers no concrete guarantee that the Air Force will actually implement the assumed plan and does not even provide any discussion of what the impacts would be if the Air Force did not adhere to the plan.

The evaluation scale for the severity of the environ-
57 mental impact (which is distinguished from the "significance" of the impact in the DEIS analysis) also underrates the effects of MX deployment. There are two particularly egregious ways in which the report does this. One is by shifting the scale so that severe impacts are classified as moderate or even low. For example, in the section on

biological resources, "low impact" means that the project "[w]ill affect widespread habitats with low diversity" and moderate impacts are those that "[w]ill affect diverse habitats or habitats supporting state-protected species"
57 (3-234). Thus, the summary impact matrix for biological resources, with its relatively few areas of high significant impact, fails to express adequately the tremendous adverse impact that the project will have on biological resources.

Another means of downplaying the severity of the impact of deployment is by presenting only a composite impact for a particular category. For example, in the section on social well-being for the city of Cheyenne and Laramie County, the DEIS lists adverse impacts which include "an increase in the number of job-seekers and indigents" (3-83), adolescent alcohol use, substance abuse, family violence
34 (3-84), and the displacement of nine families (3-85). By combining these elements into a single evaluation, the summary matrix manages to give one the impression that the positive impacts on social well-being offset the negative impacts. This clearly constitutes a misrepresentation of the facts, since the negative impacts are far more numerous--and generally more substantive and less dubious--than the positive impacts.

In some instances the DEIS explicitly downplays some of the dangers of the project. It dismisses the possibility of a nuclear accident on the grounds that the Minuteman's safety record demonstrates the low probability of such an
58 accident (pp. 1-26 ff.). Yet it offers no comments on the effect that such an accident would have although the DEIS is required to take such considerations into account. One's concerns in this area can only be heightened by the admission that the Air Force may seek exemptions from Quantity Distance Criteria (1-30). Such attitudes must make one question the Air Force's concern for the impacts of the project and

make one wonder what will prevent it from seeking exemptions
58 from the other guidelines and regulations that the DEIS describes.

Finally, the DEIS asserts that there will be "no unavoidable adverse impacts" for many of the areas it discusses, including utilities (3-139), transportation (3-176), land use (3-184), and recreation (3-195). Thus, all the adverse impacts in these categories are avoidable and one is left to assume that the Air Force will take the appropriate measures to insure that such impacts do not occur. Yet once again, there are no guarantees that additional
59 measures will be taken if those listed in the DEIS prove to be insufficient, or even that those listed will be implemented.

This is the crucial problem that recurs throughout the DEIS. The Air Force fails to offer any substantive guarantees to go along with its assurances that negative impacts will be contained. Such an absence of guarantees is especially troubling in light of the document's tendency to understate the seriousness of negative effects (as described above). As it now stands, the DEIS raises grave doubts about the Air Force's concern for the citizens and the environment of the deployment area.

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STRIDE LEARNING CENTER

Box 9816 • F E Warren AFB • Cheyenne Wyoming 82001

Phone 632 2991

Dear Ellen,

I am taking the liberty of basically rewriting STRIDE's portion of the Impact Study.

Baseline Description

STRIDE Learning Center, located on Francis E. Warren Air Force Base, provides services to children of the City of Cheyenne and Laramie County. The Center is an independent, non-profit preschool for developmentally disabled children ranging in age from birth through five years. The program offers full educational and therapeutic services. At this time, however, no classroom is available for the emotionally disturbed.

The program had a budget of $337,643.97 for FY 83. The State contributed approximately 61 percent; United Way, about 9 percent; Title I, about 11 percent; and Title XX, about 4 percent. The remainder comes from the City of Cheyenne, tuition on a sliding scale, donations and from the Federal food program.

1483 The Center employs a staff of 20, plus a consulting psychologist four hours per week. Current staff is "adequate" but does not provide for optimum services. The norms, staff-to-client ratio is about 1:3. Additional staff will be hired when the classroom for the emotionally disturbed is added.

The Center's facility is currently leased from the US Air Force at minimal charge, although it is at capacity. A modular building has been purchased to meet additional needs. A similar building will have to be purchased when funding is found for the emotionally disturbed project.

The program serves approximately 37 children, including [illegible] in the preschool and 10 in the infant program. Once a week the program serves between 12 and 16 children at a local preschool, providing therapeutic services to mildly handicapped students. The possibility of adding a classroom for emotionally disturbed children during the [illegible] school year is presently being discussed.

Projected Baseline

The only change in the nature of the services provided by STRIDE Learning Center under projected baseline is the addition of a class for emotionally disturbed children.

The program operates with a staff-to-child ratio of 1:3. Projected baseline estimates suggest that, by 1992, an additional 10 children will be enrolled, necessitating four additional staff. (This includes classroom as well as therapeutic staff.)

The facility presently operates at capacity, therefore, the acquisition of additional modular space will be required. Plans presently exist for the addition of space to serve emotionally disturbed children should this classroom be funded.

Project Impacts

1483 The services offered by STRIDE Learning Center for the multi-handicapped are not expected to change as a result of the project.

Ellen, I do feel that if the MX does come to Cheyenne we are looking at, at least, an additional 10-15 children depending on the number of people moving in to the County. With the financial situation that exists in Wyoming today there is very little chance of getting additional funds from the legislature, so resources other than State and local will have to be sought out. Not only will we need space and staff but that many more children will require more equipment. I find it difficult to believe that "no extra resources will be necessary as a consequence of the project." I am happy that the study admitted that "the impact of these projects remains unclear."

If I can be of further help, please feel free to contact me.

Fondly,

Ann E. Huey, Administrator
STRIDE Learning Center

AEH:cj



Sierra Club 292

Northern Great Plains Region

Bruce Hamilton
Regional Representative
P.O. Box 1078
Lander, Wyo. 82520
(307) 332-9034

Rose McCullough
Assistant Representative
715 South 14 St.
Lincoln, Neb. 68508
(402) 435-7053

Nov. 16, 1983

AFRCE-BMS/DEV
Norton Air Force Base, CA 92409

Dear sirs,

Please accept the following comments on your draft environmental impact statement on "Peacekeeper" in Minuteman Silos dated October 1983.

76 The Sierra Club rejects your contention that the Jackson Amendment has "exempted the basing mode and location of the action from the National Environmental Policy Act (NEPA)." On page S-1 you state that "the President's report and proposal (emphasis added)" were exempted from NEPA. This is a gross misrepresentation of the law and a violation of your responsibilities under NEPA. The Jackson Amendment reads: "The report required under this subsection shall not be subject to requirements of NEPA. Nowhere in the amendment is there any stated or implied exemption of the proposal from the law.

37 The Sierra Club believes that deployment of the MX is one of the most environmentally significant military programs ever undertaken. It is our firm belief that deployment of the MX increases the likelihood of a full-scale nuclear exchange which could have unprecedented and irreversible adverse impacts on the human environment. Such an exchange could make much of the Earth uninhabitable. It makes little sense to us to quibble about the number of deer mice that might be displaced by an MX cable route when the real impact could well be the complete alteration of life as we know it. We believe it is the responsibility of the Air Force to examine and let this country's decision makers realize that deployment of the MX could lead to nuclear annihilation. The impacts of use of the MX need to be explored and explained to be in full compliance with the law.

The Air Force has argued that it doesn't need to describe use of the missile since it hopes the missiles will never have to be used. However, there is a strong likelihood that the missiles will be used--either accidently or as part of a calculated attack or counter-attack. And many experts believe that the MX, by virtue of its increased accuracy and firepower, destabilizes the present stand-off and increases the likelihood of a fatal nuclear exchange. If this is the case, and we believe it is, then the Air Force must look at this overriding environmental concern.

38 The Air Force bases much of its lack of compliance with NEPA on the fact that the Report of the President's Commission on Strategic Forces (the Scowcroft Commission's Report) was exempted from NEPA. It is important to note here that the Scowcroft Commission did not just recommend deploying 100 MX missiles in existing Minuteman silos--the subject of this draft EIS. The Commission linked this MX deployment with rapid development and deployment of smaller single warhead ICBMs (the "Midgetman" system). It is wrong for the Air Force to look at the MX deployment in isolation--as it does in this draft EIS. Instead it should examine the package deal that the Scowcroft Commission proposed since the MX, by itself, is not the entire system.

-2-

35 The projected impacts of deployment of 1,000 Midgetman missiles dwarfs the on-site impacts of deployment of the MX. Air Force projections mention 50,000 people to maintain and guard the missiles and a vast complex of heavy duty roads with a $100 billion price tag, according to press accounts. It is misleading to write about the MX in isolation when so much else is linked to this initial decision.

Thank you for this opportunity to comment. We feel that in light of the inadequate scope of this draft you should recall it and prepare a new draft that better meets the requirements of NEPA.

Sincerely,

Bruce Hamilton

Bruce Hamilton
Regional Representative

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WYOMING CHAPTER
SIERRA CLUB

COMMENTS OF MICHAEL MASSIE, VICE CHAIRMAN OF THE WYOMING CHAPTER OF THE SIERRA CLUB, ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE PEACEKEEPER IN MINUTEMAN SILOS, OCTOBER 1983

SUBMITTED NOV. 16, 1983

"Not blind opposition to progress, but opposition to blind progress."

1248 Contradictions characterize the Air Force's assessment of cultural resources in the DEIS on the MX Missile. In several places throughout the document, the agency admits that little information exists to make a knowledgeable decision on the cultural resources' site types, impacts, and mitigation measures. Nevertheless, the agency disregards these statements and offers several conclusions concerning the nature of archeological and historical sites in the project area and the possible impacts. No support exists in the DEIS to support these determinations.

On page 2-74, Air Force personnel state that:

> ...information contained within the existing documentary record not only permits qualitative judgments about the level of potential project-induced impacts but also provides the context for drawing conclusions about the significance of such effects and the appropriate mitigation measures for reducing or eliminating them.

Conversely, the DEIS also notes on page 3-196 that the "...specification of impact level in any absolute sense requires far greater knowledge of resources than is currently available." And, on page 3-197, the agency admits that "...it is not possible at this time to identify all properties that will be affected by project-related activities. Similarly, it is impossible to determine in advance the exact nature and spatial extent of such anticipated impacts." Finally, the Air Force concludes on pages 3-197-198 that "...estimation of the degree of expected loss or gain of important scientific or humanistic qualities at a given resource locality must be based almost exclusively on professional judgment."

In just a few pages, Air Force personnel have abandoned their previous contention that they used facts in formulating their determinations and finally admit that they resorted to "professional judgment", and not data, in arriving at their conclusions. In order to assess the legitimacy of this "professional judgment", especially with regard to a document which contains several contradictory statements, the available information must be examined.

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1249 According to 36CFR800, 36CFR60, and other regulations, cultural resource work entails three steps. First, an archeologist and an historian must conduct a literature (Class I) and an intensive in-field survey (Class III) of the proposed project's impact areas. In addition, these professionals must assess whether a particular site is eligible for the National Register of Historic Places. Second, the federal agency must determine if the project will have no effect, an effect, or an adverse effect on an important site. Third, the agency must mitigate any adverse effects before the project can proceed. These steps are not interchangeable. They must proceed in this order. For large projects such as the MX, this information is evaluated in a DEIS and proposed alternatives are formulated.

1248 In the MX DEIS, the Air Force fails to provide adequate information on any of these steps. The agency has not conducted a Class III survey of any of the impact areas, such as the upgraded roads, new road configuration, upgraded bridges, the ten buried cable routes and the three construction staging areas. As a result, the Air Force bases its "professional judgment" upon existing, Class I, data.

1250 The existing information is so inadequate that it is impossible to arrive at any professional judgments or conclusions. As the agency admits on page 3-199, the "...existing resource inventory data...represents less than one percent coverage" of the area. In other words, less than 1% of the project's impact areas have previously been surveyed. To corroborate this situation, the survey of this 1% of the land has yielded 1,410 prehistoric sites, but only 7.8% of these sites have been evaluated with regard to the National Register. In addition, only 19.8% of the 1191 known historic sites have been analyzed. Therefore, the Air Force is basing its conclusions ("professional judgment") on only .07% of the prehistoric sites and only 1.9% of the historic sites that actually

exist in the impact areas. Professionalism, as well as common sense, indicate that no determinations are legitimately based on such low percentages and such meager knowledge.

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Also, on page 2-79, the MXEIS cites three previous historical overviews of the Region of Influence. Jewell's 1968 report and O'Neil's 1981 work are not pertinent studies for they do not attempt to identify historical resources anywhere in the region.

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As a result of an inadequate information base, the conclusions concerning impacts on pages 3-303-305 and in the table on page 2-6 are not supported with facts. Before arriving at any determinations concerning the degree of impacts and the nature of mitigation measures, a Class III survey is necessary and legally required. After conducting this in-field survey, any area which falls into the moderate and high impact categories should be dropped, and alternative areas chosen.

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Since a MXEIS should draw conclusions based upon sufficient information, the lack of data is sufficient reason to refute the cultural resources section of this MXEIS. Nevertheless, several other errors characterize this document. First, the Air Force has made some critical mistakes in its premature discussion of mitigation measures. For most historical sites and some prehistoric sites, avoidance is not only the best mitigative plan but usually the only one. However, due to the admitted lack of information, the Air Force could not indicate which sites required avoidance (3-309). Rather than correcting this absence of information, the agency simply dismisses avoidance as a legitimate mitigative tool. Thus, many important sites such as historic trails and structures will be destroyed rather than avoided and preserved for the enjoyment and education of future generations. This illustrates the disastrous efforts which will occur because the Air Force is basing decisions in this MXEIS upon inadequate information.

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Second, the MXEIS fails to assess the potential damage to cultural sites caused by the influx of more people into a specific area to construct and to maintain the MX missiles. Vandalism and pot-hunting greatly increase when this occurs.

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Third, the MXEIS does not elaborate on the differences between a prehistoric site and an American Indian cultural site. It appears that the former is contained in the latter term. In identifying American Indian sites in the area, the Air Force should contact the Tetan Sioux tribe which occupied the area in the early and mid-nineteenth century. Also, the agency should consult the American Indians Against Desecration for information on burial-reburial policies and on any sacred sites in the region.

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Due to the failure to compile an adequate information base and to conduct a Class III cultural resource survey, the Air Force's MX MXEIS is unsatisfactory in identifying cultural resources which the project will adversely affect. Due to the obvious contradictory statements, it appears that the Air Force manipulated the few facts to arrive at a predetermined conclusion. By aborting the environmental investigation process in this manner, the MXEIS will insure the destruction instead of the preservation of important cultural remains.

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The Snake River Alliance

[redacted] [redacted] [redacted] [redacted]

Box 1731 · Boise ID 83701 · 208/344-9161

November 28, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFSCE-MXE
Norton Air Force Base, California 92409

Dear Major Walsh:

The following are our comments on the Draft Environmental Impact Statement on the proposed deployment of the MX in Minuteman silos. The Snake River Alliance is an Idaho citizen's group, and a charter member of the multi-state Western Solidarity. We believe the education of ourselves and others is a major step in the process of citizen involvement. We actively encourage the use of the NEPA and MXEIS process as major projects as an irreplaceable way to involve citizens in the democratic process that is the lifeblood of the United States.

We congratulate the preparers of the MX-DMXEIS for its readability and clear organization. MXEIS are difficult beasts to categorize and publish so as to be accessible to the public. This MXEIS avoids some of the tangles that might confound the public.

Unfortunately, the public, including those of us who use MXEIS' more often than we might like, were not given the time to read and study this massive document before the comment period had elapsed. Please take note of our plea for a longer period of time. There can be no excuse for bypassing the full public process in any well-thought out government project.

23

We object to the narrowness of the area chosen to be studied, and, therefore, the narrowness of the area covered with scoping hearings. For one reason, if the MX is deployed under present plans, the greater western United States will become a target to a Soviet first strike or retaliatory strike. For another reason, transportation of nuclear materials and missile parts will impact a much greater area than that studied within the MXEIS. We feel the Air Force must include in this process a much greater area - it is simplistic to only examine basing impact.

53

We object to the unrealistic "Peacekeeper" title being tagged on the MX. The MX should take its rightful place in our lore besides the Minutemen, Pershing, etc. as a clear weapon of war. The MX is being produced because of a perceived "window of vulnerability" in the defense triad. It is not at all clear to the U. S. citizenry that this "window" exists; it is not likely that the Soviets would risk a first strike, and if they did, our two remaining "legs of the triad" would be more than enough to destroy Russia. Let the U. S. citizenry be called the "Peacemakers" and this nuclear weapon remain the MX.

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MX DEIS comment
Snake River Alliance
page 2

Our most strenuous objection is to the misuse of the NEPA process by the Air Force. The MX-DEIS reflects a blatant dismissal of the concerns of the hundreds of westerners who flocked to the hearings and prepared statements. The hearings were conducted in such a way as to give the Air Force the time for presentations while not allowing for all citizens in attendance to speak.

16

The citizens deserve a better answer to their well-founded fears than the sarcasm shown in the DEIS. It is ridiculous to say the environmental aspects of war are "speculative." The United States government has spent billions of dollars since the early 1940's to determine the exact effects of nuclear weapons. The Air Force might consider making use of the considerable expertise available on this subject to better answer such legitimate fears.

37

Further, the handling of the public comments in the document is ludicrous. It is a slap in the face of every citizen who earnestly attended the hearings that no official transcript was made to be included in the DEIS. Surely the name and concern of each involved citizen is as important to this process as the names and titles of the preparers/consultants filling the back of the DEIS.

10

Given the little regard shown to public input or concerns, and the apparent inability of the Air Force to answer the public's questions, this document might better be called a "feasibility study."

51

Sincerely,

Kerry Cooke

Kerry Cooke
Snake River Alliance

295 TESTIMONY FROM CHEYENNE, WYOMING PUBLIC HEARING REFER TO PAGE 6.2-333	296 TESTIMONY FROM CHEYENNE, WYOMING PUBLIC HEARING REFER TO PAGE 6.2-341
297 TESTIMONY FROM CHEYENNE, WYOMING PUBLIC HEARING REFER TO PAGE 6.2-345	298 TESTIMONY FROM TORRINGTON, WYOMING PUBLIC HEARING REFER TO PAGE 6.2-412

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TESTIMONY FROM

WHEATLAND, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-392

300

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-345

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Western Solidarity

To Oppose and Defeat MX

Box 20532
Denver, Colorado 80220
(303) 355-5124

AFSCE—BMS/DEV
Norton Air Force Base, Calif.
92409

November 28, 1983

Dear Air Force,

Western Solidarity is an eight state regional organization opposed to the deployment of Missile Experimental (MX) for military, socio-economic, environmental and moral reasons. We are a coalition of coalitions, endorsed by several dozen citizen groups throughout the country, whose memberships are in the hundreds of thousands. Some of these include Clergy and Laity Concerned; Common Cause; National and Nebraska chapters of Women in Farm Economics (WIFE); National Council of Churches; American Friends Service Committee; Rocky Mountain Farmers Union; Montana Farmers Union; United Church of Christ, Nebraska Conference; Nevada Cattlemen's Association; Wyoming Bilateral Nuclear Weapons Freeze Coalition; Wyoming Outdoor Council, and many others.

Western Solidarity is an umbrella group, together with the Washington-based National Campaign to Stop the MX, for people of diverse political beliefs, and widely varying opinions on what our national defense posture should be.

We have made an effort to maintain an open dialogue with the United States Air Force as controversy in the proposed deployment area has grown. We strive to keep high visibility and have made it clear that we see the dissemination of reliable, accurate information on the MX a priority.

15 However, the United States Air Force has neglected its obligation to this public discussion process. In fact, the utter unwillingness on the part of the USAF to share information has created the impression that the Air Force is intentionally stifling public debate.

12 Although immediately following the Scowcroft recommendation that MX be placed in fixed silos in Wyoming and Nebraska the Air Force was already less than open, your hostility to the public process became most evident as scoping hearings for the DEIS were announced in late Spring 1983. Scoping hearings were scheduled from June 27-July 1 and included the towns

WSMX

Steering Committee

Executive Committee

Staff

of Cheyenne, WY (pop. 47,000); Pine Bluffs, WY (pop. 1,000); Wheatland and Torrington, WY (about 5,000 each); Harrisburg, NE, (pop. 70) and Kimball, NE (pop. 3,000). There was less than two weeks public notice for the time and location of these hearings, and in at least one instance, Pine Bluffs, the city officials were completely unaware of the hearing and had scheduled a crucial city council budget meeting that night.

12 Seven hearings were held in five days and when Western Solidarity objected to the brevity and crowdedness of the schedule, we were told the President had an IOC of December 1986 and he wanted no delays. That response is worse than lame; it's rather ludicrous, since the proposed project is a multi-billion dollar weapons system of monumental international significance which will heavily impact the heart of America's range and wheat growing land. One would think the United States government would like to give America's farmers and ranchers more than five days to digest the prospect of MX.

22 Despite requests from Western Solidarity and others, including the Governor of Colorado, Rep. Hank Brown (R-CO), the mayor and City Council of Ft. Collins, CO, that the Air Force expand public hearings into Colorado, and despite the fact that northern Colorado and possibly Denver will be significantly impacted by the proposed project, the Air Force refused to hold public hearings there. Similar requests to expand the hearings to throughout Wyoming and Nebraska were also flatly denied. Even Scottsbluff, NE, the largest city in the Panhandle and the center of social services, commerce and trade for that part of the state, was not deemed worthy of a hearing, although it is 14 miles from the proposed deployment area.

13 The hearings themselves were an exercise in frustration. Western Solidarity held workshops in area towns to brief people on what a scoping hearing should look like, as outlined by the National Environmental Protection Act, (NEPA) and what the Air Force actually intended — which can best be summarized as heavy-handed inhibition of free discussion, in flagrant violation of the intent of NEPA. We encouraged people to attend the hearings and ~~encouraged~~ up supplying the public address system as well (although you promised the public microphones would be in place).

We were told by officials at Norton Air Force Base that a petition of citizens at the hearings to broaden the hearing process would be honored by Air Force personnel. In fact, despite signatures of well over 50% of attendees in Cheyenne requesting that the hearing not be broken into 11 small discussion groups, the Air Force refused to respect the request and were openly hostile to the audience, resulting in a great deal of commotion.

The hearings were very well attended, but because the hearings were scheduled in the most remote areas, some people travelled up to 200 miles to be included in the public process.

24 On October 14, the voluminous DEIS was issued. A forty-five day comment period was announced, and DEIS hearings were scheduled for Nov. 1-4, in the same towns as were the scoping hearings. The regional headquarters of Western Solidarity received its first copy October 25. An enormous number of complaints were received by our office about the inability to get documents. Consultants for Western Solidarity as well as organizational activists were met with hostility by the officers in charge of distributing the DEIS at Norton Air Force Base. But at last we did receive the 600 page

-more-

24 document (which lacks an adequate index or consecutive numbering system). We were told by your officers at Norton that we could not receive the 12 volumes of technical support data. This policy was suddenly reversed at the public hearings in November.

19 Although public notice was more visible for the DEIS hearings than it was for the scoping hearings, we were faced with the entire hearing process condensed into a four-day period, with two hearings in different towns on three of those days at inconvenient hours. We would think that an agency of the United States government interested in public input and debate, would schedule separate days for each town, at convenient (early) hours leaving plenty of time for all participants to be heard. In fact, the DEIS hearing in Cheyenne on November 1 at 8 pm ended before many of those prepared to speak had a chance to.

We at Western Solidarity, and many of those we represent, have marvelled at the cavalier manner with which the United States Air Force has approached the western citizenry. We have noted the utter hypocrisy of a governmental agency, entrusted with protecting and strengthening national security and defense -- the absolute heart of which are our democratic freedoms -- as it continually subverts and circumvents the public process. The importance of installing the MX has loomed larger than the need to preserve the people's right to participate in the very society this weapon is designed to protect.

23 The icing on the cake, of course, is that while the measly 45-day comment period comes to a close on Monday November 28, it is preceded by our four-day national Thanksgiving holiday, a time that few of us planned to be summarizing our responses to the MX DEIS. George Orwell couldn't have written it better.

These written comments are submitted as addenda to our oral comments made at the D.I.S hearings in November, 1983, along with our formal statement of response and other supplements which were completed too late to be included in our general report, entitled Keeping the Peace. All of our comments are delivered under protest fo the reasons stated above.

Western Solidarity is proud to offer these criticisms of the United States Air Force, as well as the missile system itself, as we take seriously the responsibility of every American citizen to participate in government, working towards the realization of government of, by and for the people.

Submitted for inclusion in the Final EIS by Ms. Evelyn Lifsey, Coordinator,
Western Solidarity Box 20522 Denver, CO 80220

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-471

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Western Solidarity

...To Oppose and Defeat MX

8308 Montview Blvd.
Denver, Colorado 80207
(303) 388-5124

27 November, 1983

AFRCE-BMS/DEV
Norton Air Force Base
California 92409

Hello:

104 Western Solidarity requests that the enclosed documents be included and incorporated with our primary comment document which has been mailed to you in a separate envelope by our chair, Tim Strand.
Thank you.

Karla Painter

Enclosures:

Steering Committee

Executive Committee

UNION OF CONCERNED SCIENTISTS FACT SHEET

MX: FOUR FALLACIES

The Reagan Administration and the Scowcroft Commission have recommended the development of the MX missile system for the following reasons:

- The United States needs to build the MX to preserve the effectiveness of its nuclear deterrent.
- The MX is necessary to give us the capability to threaten Soviet hard targets.
- The MX is essential to deter the threat of conventional attacks on the alliance by the Soviet Union.
- The MX is necessary to demonstrate US resolve and to pressure the Soviet Union into reaching arms control agreements with the United States.

The Union of Concerned Scientists does not concur with these justifications for proceeding with the MX. Our reasons are outlined below in response to each of the four points.

(1) The US Needs to Build the MX to Preserve the Effectiveness of Its Nuclear Deterrent.

Commission arguments: Our forces are older than those of the Soviets. The USSR is also ahead in numbers of ICBMs and is gaining in submarines. US modernization of our ICBM force is therefore necessary. It is also needed to maintain the credibility of the triad.

UCS response: In fact, US and Soviet forces are of roughly comparable age. Our strategic bomber force is newer than the Soviet equivalent (the B-52s were deployed after the Soviet Bears and Bisons. Our bombers have also been modernized more extensively; new equipment includes the same offensive avionics package scheduled to be included on the B-1B.

Our ICBM missiles are older, but the warheads are about the same age as those on Soviet ICBMs. Three hundred of the Minuteman III missiles have recently been retrofitted with 1979 of the new, more accurate Mk-12A warheads. The Soviets have a marginal advantage in current warheads on their ICBMs, but they also have the serious liability of concentrating more than 70% of their strategic warheads on potentially vulnerable land-based ICBMs.

There is no evidence to support the contention that the Soviets are gaining in submarine technology. Our submarines are older, but our missiles are considerably more modern than those of the Soviets. For example, within the last four years the US has deployed over 200 new Trident I missiles with more than 1700 warheads. These missiles are newer than virtually all of the missiles in the Soviet submarine force. In addition, US submarine improvements and ASW development are proceeding. US technological sophistication has traditionally been far superior to that of the Soviet Union. Indeed, Secretary of the Navy John Lehman testified in March that US submarines would remain largely invulnerable throughout this century. He also said that submarines were becoming less rather than more vulnerable.

The Scowcroft Commission staff has acknowledged that the Soviets cannot effectively undertake a simultaneous attack on US submarine ports, bomber bases, and ICBMs. The Commission concludes that ICBM vulnerability is not a critical issue for the present, and that each leg of the triad is reinforced by the capabilities of the triad as a whole. In short, the Scowcroft Commission has fully repudiated the Administration's window of vulnerability argument overturning what was previously the principal justification for proceeding with MX deployment.

The US triad is formidable. It is immensely powerful and will retain for decades a great capacity for retaliation in the event of an attack on it. Its deterrent value is more than adequate for the foreseeable future.

(2) The MX Is Necessary to Give the US the Capability to Threaten Soviet Hard Targets.

Commission arguments: The Soviets have a prompt hard target kill capability and we do not. We need a prompt hard target kill capability and can gain it with the MX.

UCS response: MX missiles in Minuteman silos can add to our capabilities only if we plan to use them in a first strike against the Soviet Union. The Soviets will not launch a first strike unless they believe they can destroy US missiles in the silos. MX does not alter that Soviet calculation; it simply places more valuable targets in the silos. The Commission report states that there is considerable merit in moving toward an ICBM force structure in which potential targets are of comparatively low value—missiles containing only one warhead. The proposed deployment of MX flatly contradicts that proposal.

The Commission report does not adequately defend the necessity for a time-urgent response—that is, the prompt hard target kill potential offered by the MX. If MX is intended for a second-strike response, it is not needed. There will be a limited number of hardened targets against which we need to respond. After all, the Soviet missile silos will largely be empty. Once the Soviets have launched an attack on the US, those missiles that remain in Soviet silos will probably be in "launch-on-warning" status ready to be released as incoming US missiles are detected.

Furthermore, the US hardly needs additional capacity to strike Soviet hard targets. It now has increasing numbers of cruise missiles as well as a powerful bomber force. These second-strike weapons are already adequate for attacking important hard targets remaining after a Soviet attack. The US can also respond without directly attacking Soviet cities by destroying industrial and soft military facilities not located near population centers. Such a response would not require MX.

(3) MX Is Essential to Deter the Threat of Conventional Attacks on the Alliance by the Soviet Union.

Commission argument: The US needs the MX to convince the Soviets that a Soviet conventional attack risks a strategic nuclear response by the US. MX is essential to this response because of its "promptness" and "controllability."

UCS response: Increasing the use of nuclear weapons in response to a conventional attack would be dangerous and suicidal, particularly if strategic nuclear weapons are used. There is no basis for the presumption that nuclear war can confidently be limited, or confined to a timely number of exchanges short of escalation to all-out nuclear war. Limiting tactical nuclear war on the battlefield of Europe or elsewhere is difficult enough to believe; controlling nuclear war waged with ICBMs is inconceivable. The very feature of MX capability that the Scowcroft group finds so attractive—promptness—virtually guarantees that any use of the MX will quickly escalate to an uncontrolled exchange, and bring about the total destruction of the USSR and the United States. We would lose far more than we would gain.

(4) The MX Is Necessary to Demonstrate US Resolve and Pressure the Soviet Union into Resuming Arms Control Agreements with the United States.

Commission argument: Cancelling the MX would signify to the Soviets that we do not have the will essential for deterrence. Abandoning MX would reduce the likelihood of reaching a stabilizing arms control agreement with the Soviets.

UCS response: Lacking a military justification for building MX, the Commission has resorted to a political argument. A key conclusion of the Scowcroft report is that we must deploy the MX to demonstrate US resolve. If we do not, the Soviets will doubt our "national will and cohesion." But the United States already has a secure, powerful, and redundant deterrent force. The Soviets know this. Rejection of the MX would demonstrate that we ourselves are confident in the strength of our deterrent. It would also signify to the Soviets and the rest of the world that we are serious about arms control.

Second, there is little hope that MX deployment would pressure the Soviets to negotiate, as expected by the Scowcroft Commission. The Soviets are more likely to respond to MX deployment by augmenting and improving both their defensive and offensive weapons. Thus, instead of reducing the Soviets to negotiate on arms control, MX deployment could provoke a counter buildup by the Soviets, which would quicken the pace of the already vigorous nuclear arms race.

Additional Consequences of the MX

The decision to deploy MX in Minuteman silos risks three major consequences. The first is that US ICBMs will be placed on a greater alert status at crucial times, in order to avoid having them destroyed in their silos. This alert status—"launch-on-warning"—in itself could precipitate the event we are seeking to avoid. Given the sensitive nature of the US warning system and its frequent false alarms, launch-on-warning would be an extremely dangerous posture.

A second possible consequence is that the President will soon argue that we must protect the MX, because superhardening the silos is not feasible in the near term. A ballistic missile defense (BMD) will be the obvious candidate to provide such protection. Yet even the Scowcroft Commission admits that the best fixed, point defense BMD systems would violate the 1972 ABM treaty.

A third consequence is violation of the SALT II treaty, which the President has pledged to observe.

The flight testing and deployment of two new missiles will violate SALT constraints, as will the construction of new superhardened ICBM silos. The Commission response is that SALT will have expired by the time the second new ICBM is deployed. Until the Reagan Administration came to office, the assumption underlying arms control negotiations was that constraints would become more rigorous over time, not less. President Reagan plans systems that violate the SALT II treaty even while claiming to observe the treaty.

Conclusions

In conclusion, several factors are worth repeating:

- Minuteman "vulnerability" is a political, rather than a military, problem. A perceived weakness—the fictitious window of vulnerability—sparked development of the MX. Now that it is clear that the weakness does not exist, we do not need the system.
- MX is a first-strike weapon. The US does not need a prompt hard target kill potentially provided by the MX. MX deployment is not consistent with US deterrence goals.
- Deployment of the MX as an instrument of US first-strike policy risks escalation to all-out nuclear war.
- Building the MX to "coerce" the Soviets to negotiate is likely to fail. The more likely Soviet response is to improve their strategic forces to counter any new capabilities that the MX might provide the US.

For information, contact:
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Council for a Livable World

FACT SHEET

John Isaacs, *Legislative Dire*

WHY THE MX SHOULD NOT BE FUNDED AS A "BARGAINING CHIP"

President Reagan declared in his November 22, 1982 speech to the nation that the United States should build the MX to "increase the prospects of reaching significant arms reductions with the Soviets." His argument is that the Soviet Union will have no incentive to negotiate unless the U.S. demonstrates a commitment to increase its military strength and that the U.S. will have nothing to bargain with unless it adds the MX to its arsenal. Thus, the MX has been labeled a "bargaining chip".

The President's arguments are faulty. They are weak excuses to proceed with a costly and dangerous weapons system for which he has difficulty finding justification. A closer examination of the "bargaining chip" theory follows:

1. The Soviet leadership already has more than enough incentive to negotiate on arms control. Lessening the chance of a nuclear holocaust is clearly in Soviet as well as American interests. Moreover, the Soviets have good reason to feel very threatened by the current U.S. nuclear arsenal and by many other weapons systems scheduled for deployment in the near future -- even without the MX. The new MK 12A warhead for the Minuteman III missile and the Trident II submarine-launched missile both possess the theoretical capacity to destroy Soviet missile silos. The Pershing II missile is designed to destroy hardened command and control posts and will cut down Soviet warning time from about 30 minutes to about 8 minutes. In addition, the extensive American cruise missile program, our virtually invulnerable submarine force, and our new radar-evading bombers all provide more than enough incentive for the Soviets to negotiate.

2. The Administration has no intention of bargaining the MX away. President Reagan and Secretary of Defense Weinberger have referred to the new missile as a bargaining tool while at the same time clearly indicating that the first 100 MX missiles are not up for negotiations. Indeed, the President's START proposal carefully allows for the deployment of 100 MX missiles with their 1,000 warheads. The administration has explained that this reputed "bargaining chip" will come into play only as a second batch of up to 100 more MX missiles are considered for deployment. That decision would not come until 1987 or so, after the Administration is well along in its arms build-up. In his speech, Reagan specifically held out the prospect of building even more silos: "We would prefer that the Soviets dismantle SS1b,, rather than we build more holes."

OVER

3. In any case, the "bargaining chip" theory is a bankrupt one. History has shown that "bargaining chips" end up being built rather than bargained away. Most weapons programs develop constituencies within the government, industry and labor force that will fight to see the program continue. It quickly becomes very difficult to halt a weapons system already in production. A striking example of the failure of a "bargaining chip" is the cruise missile. A principal argument given for the development of cruise missiles was to use them as a "bargaining chip" in the SALT negotiations. Now, a decade later, instead of being swapped for Soviet concessions they are a firmly established part of our arsenal and we will likely be faced with a Soviet cruise missile program in response.

4. The "bargaining chip" policy may seriously impede successful negotiations. Pursuing new and threatening weapons systems such as the MX while negotiations are underway is likely to complicate negotiations for qualitative and quantitative limits on nuclear weapons. Moreover, any "bargaining chips" we produce will certainly be countered by new Soviet "bargaining chips", raising the stakes in the negotiations rather than moving toward constructive solutions.

5. The "bargaining chip" policy can not be accurately credited with the successful negotiation of the 1972 ABM treaty. President Reagan clearly misinterpreted history when he stated that the Soviets would not have negotiated this treaty if the Senate hadn't approved U.S. ABM plans. The U.S. and the Soviet Union agreed to a treaty because each realized that ABM technology at that time was not advanced enough to confer any military advantage vis-a-vis the other superpower. In fact, the U.S. completed one ABM site in North Dakota and then quickly abandoned it.

Ironically, the lesson to be learned from this episode is exactly the opposite of that cited by the President. The loud and clear reservations voiced by the American public and the Congress to ABM played a significant role in getting a treaty with the Soviets. In Congressional testimony, then Secretary of Defense Melvin Laird indicated that he had gone along with the treaty because 3½ years of heated controversy had convinced him that Congress could not be counted upon to approve Pentagon plans for an ABM system.

This document contained the following attachment:

Smith, R. Jeffrey, "The MX Missile and The Strategic Balance of Power," Science reprint series (2nd edition 1982 and 1983.)

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TESTIMONY FROM
TORRINGTON, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-415

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TESTIMONY FROM
WHEATLAND, WYOMING
PUBLIC HEARING

REFER TO
PAGE 6.2-393

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TESTIMONY FROM
HARRISBURG, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-441

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TESTIMONY FROM
CHEYENNE, WYOMING
PUBLIC HEARING

REFER TO
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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

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TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-315

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-349

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Western MX Solidarity

...To Oppose and Defeat MX

Box 20522
Denver, Colorado 80220
(303) 355-5124

November 28, 1983

Major Peter Walsh
Director, Environmental Planning Division (DEV)
Department of the Air Force
AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh,

Enclosed are Western Solidarity's comments on the Draft Environmental Impact Statement, Peacekeeper Missile in Minuteman Silos. These comments were compiled from separate reviews by Western Solidarity's staff and supporters in Wyoming, Nebraska, Colorado, Montana, and other states. They represent an intense effort to read and review many hundreds of pages of technical manuscript in less than one month.

Western Solidarity represents over 100 citizen groups in opposition to the the proposed MX deployment (see Preface for list). Together, these organizations represent hundreds of thousands of concerned individuals. In addition, Western Solidarity endorses the comments submitted by cooperating groups and individuals listed in the letter submitted separately by Andrew Reid, Western Solidarity counsel. We incorporate those comments into our own by reference. Western Solidarity also incorporates by reference the comments made at the scoping hearings, which are attached to Mr. Reid's letter. This is done to reduce duplication and make easier the response to public comments.

We hope and trust that you will give these comments your serious attention, as befits the significance of this issue.

Sincerely,

Andrew B. Reid, Esq.

Tim Strand

Steering Committee

Ed Blake, Provo, CO ☐ Jeanne C. Gardner, Castle Dale, UT ☐ Mike Harris, Provo, ID ☐ Glenda Rasmussen, Rapid City, SD
Alice Hildebrandt, Cheyenne, WY ☐ Wayne Pennell, Salt Lake City, UT ☐ Barbara B. Reed, Reno, Chairman, NE ☐ Rose Saint, Chairman, NE
Ken Stephen Stevens, Denver, CO ☐ Christine Tregillus, Bozeman, MT ☐ Judy Trybulski, Las Vegas, NV ☐ Rosamond Tyndall, Las Vegas, NV

Executive Committee

John Matthews, Chairman, MT ☐ Wayne Pennell, Salt Lake City, UT ☐ Tim Strand, S.D., Cheyenne, WY

Staff

Evelyn Libby, Denver, CO ☐ Rhoda Pember, Mountain Home, NV ☐ Dr. Petronella Rossetti, Cheyenne, WY ☐ Mike Wilson, Helena, MT

KEEPING THE PEACE

Comments on the Draft Environmental Impact Statement

Peacekeeper (MX) Missile in Minuteman Silos

submitted by

WESTERN SOLIDARITY

P.O. Box 20522
Denver, Colorado 80220

November 28, 1983

PREFACE

The following comments were prepared by Western Solidarity, a broad-based citizen coalition concerned about the proposed deployment of the so-called "Peacekeeper" (MX) missile in the western U.S. Western Solidarity opposes the design, testing, construction and deployment of the MX in any basing mode. Our opposition is based on the belief that the MX serves no useful deterrent purpose, would aggravate the arms race, is too costly, carries unacceptable risks to the environment, economy and to society, and--fundamentally--would increase the threat of nuclear war. Western Solidarity is thus opposed to the MX on moral, environmental, economic, and political grounds. 104

Our comments on the Draft Environmental Impact Statement (DEIS) prepared by the U.S. Air Force on the proposed MX deployment in Wyoming and Nebraska are offered in the hope that the Administration will realize the terrifying consequences of deploying this weapon. There has probably never been an environmental issue as great as the threat of nuclear war. The National Environmental Policy Act, as the statute requiring environmental impact statements, is the citizen's means for ensuring that the Federal government takes seriously its responsibility as trustee of the environment. Our comments are thus intended to help the Federal government perform its required analyses in a proper manner. We are confident that if it did so, the MX would be abandoned and a reasonable alternative that would keep the peace would be chosen.

The Air Force, however, has given no indication that it takes its legal responsibility under NEPA seriously. It appears to regard this EIS as a bothersome formality to be dispensed with before proceeding with deployment of the MX. The Air Force may wish it could preserve the appearance of due process, but citizens' legitimate concerns about the MX are being ignored. 76

We offer our comments on this EIS in good faith and a constructive spirit, hoping that the Air Force will recognize the importance of following the important environmental review procedures required under NEPA. Surely the MX deserves full and fair review under NEPA, which requires that the Federal government consider the world-wide, long-range consequences of it actions. The MX would have serious adverse consequences for both the deployment area, the nation, and the world. We call on the Air Force to begin now to conduct the environmental review required of it by law.

In our comments, we call the MX by its original name, not by the euphemism given it by the Administration. The name "Peacekeeper" was chosen in reference to the Colt .45, the lawman's weapon of the Old West. It is truly ironic that West now faces a Federal agency that is prepared to break the environmental laws of the land in order to have its MX. We ask that the law be enforced and the MX halted to permit fair review. Only then can we truly hope to keep the peace. 104

Reformed Church in America
Riverside Church Disarmament Program
SANE
Sierra Club
Sojourners
Student Alliance for an Immediate Freeze
Tri-State Coalition
Union of American Hebrew Congregations
Union of Concerned Scientists
Unitarian Universalist Association of Churches
United Campuses to Prevent Nuclear War
United Church of Christ
United Electrical Workers
United Food and Commercial Workers
United Methodist Church, Office of Public Policy
United Methodist Church, Board of Global Ministries
United Presbyterian Church
United States Student Association
Washington Peace Center
Western Solidarity
Wilderness Society
Women for Racial and Economic Equality
Women Strike for Peace
Womens' Intl League for Peace and Freedom
Women's Action for Nuclear Disarmament
World Federalist Association
World Peacemakers
YWCA of USA, National Board

COLORADO:
Citizens Against the Arms Race
Colorado Council of Churches
Rocky Mountain Farmers' Union

MONTANA:
Citizens for an MX-Free Montana
Montana Farmers' Union
Montana Network for Nuclear Disarmament

NEBRASKA:
Christian Church in America (Nebraska Synod)
Nebraskans for Peace
Nebraskans Opposed to the MX
Sierra Club (Northern Plains Regional Committee)
United Methodist Church (Annual Conference)

NEVADA:
Citizens' Alert
Citizens' Call
Great Basin MX Alliance
Native Nevadans for Political Action
Nevada Cattlemen's Association

WYOMING:
Wyoming Against the MX
Wyoming Church Coalition
Wyoming Citizens' Alliance
Wyoming Education Association
Wyoming Nuclear Weapons Freeze Coalition
Wyoming Outdoor Council

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I. INTRODUCTION

The U.S. Air Force has decided to deploy 100 MX ("Peacekeeper") missiles in 100 Minuteman silos in Wyoming and Nebraska. They have published a Draft Environmental Impact Statement (DEIS) which purports to meet their responsibilities for a full and fair analysis of the environmental impacts of this decision, as required by the National Environmental Policy Act (NEPA). In these comments on the Air Force's DEIS, however, we will demonstrate that the Air Force has not met its environmental review responsibilities under NEPA. The Air Force has arbitrarily constrained the scope of the analysis; inadequately assessed the environmental consequences of its actions; improperly examined alternative courses of action; and limited public review of its actions. For these and other reasons, the DEIS does not meet the minimum standards established by the Council on Environmental Quality for EIS's (40 CFR 1500 et seq.). To meet its legal requirements under NEPA, the Air Force would have to prepare and circulate a revised DEIS, not merely correct the faults of the current DEIS.

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Western Solidarity is a coalition of citizen groups concerned about all aspects of the MX missile — social, economic and environmental. Fundamentally, we believe that the MX will lessen our national security at great cost to the economy, the environment, and the well-being of people. Western Solidarity opposes the development of the MX missile for moral, social, economic, environmental and defense reasons. We believe that a properly-prepared EIS would demonstrate that the MX missile, in any basing mode, would cause unacceptably high environmental impacts. We further believe that logical alternatives exist to the MX that would protect the nation's security at much less cost to the economy, the environment, and to people.

The Air Force is responsible for presenting a proper environmental analysis, with full public review, that will present the true alternatives to the MX and rigorously compare their costs and benefits. When a revised EIS is prepared that meets the requirements of NEPA, we believe it will show that the MX is a bad bargain. Our comments are offered in the hope that the Air Force will recognize the value of a properly-prepared EIS.

The DEIS contains a great deal of information which, at first glance, leads one to conclude that a proper analysis has been performed. Its volume is impressive. Indeed, there are the beginnings of a good analysis: the DEIS suggests explicit criteria for judging the significance of environmental impacts, and attempts to evaluate the proposed action according to those criteria. But the DEIS's very bulk obscures the central flaw of the analysis--the Air Force's improper selection of alternatives for analysis. The assumptions underlying the analysis are faulty; they arbitrarily restrict the scope of the analysis to issues the Air Force wants to address, and they ignore the crucial issue of whether the MX should be deployed. This renders the analysis that is presented meaningless. And even given the unjustifiably narrow range of alternatives presented, the analysis is flawed: it slights key impacts on the people, the land, and the biota of the selected deployment area.

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II. THE PROPOSAL AND ITS ALTERNATIVES ARE UNJUSTIFIABLE

There has probably never been an issue with environmental implications as great as the MX. In reviewing this EIS, it is easy to get lost in the details of localized impacts on the project area and ignore the broader issue of the missile itself. Indeed, the Air Force has made every effort to encourage this myopia. The DEIS studiously ignores alternatives to the MX, incorrectly claiming that the Jackson Amendment to the 1982 Defense Appropriations Act exempts it from analyzing such alternatives. Without underplaying the severe impacts the selected deployment would have on Wyoming, Nebraska, and Colorado, we believe that the DEIS subverts NEPA by ignoring the key issue: the great danger posed by the MX itself, in any deployment mode or location.

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We will not reiterate here the many arguments against the MX which Western Solidarity's member organizations have raised, and which we incorporate by reference (see preface). As they relate to environmental concerns, they include:

- The increased risk of nuclear war posed by a missile with first-strike justification and capability.
- The huge cost of the MX which will drain Federal money and capital from neglected social and environmental programs.
- The change in our strategic deterrent to an offensive posture.
- Other arguments as shown in materials submitted at the scoping hearings (see attachments to letter submitted separately by Andrew Reid).

Increasing the risk of nuclear war carries with it environmental implications that are staggering. It is ironic that the Air Force is soliciting comments on a narrowly-constrained EIS on local impacts of the MX when two respected scientific commissions (the Office of Technology Assessment and the Ehrlich-Sagan commission) have published reports documenting the disastrous environmental effects of a nuclear war. The destructive force in 100 MX missiles alone carries the potential to end life on earth through total disruption of the biosphere. Surely there can be no greater environmental impact than this. Any government action that might increase the risk of war deserves the most careful and objective evaluation. NEPA requires that the Air Force consider the "worldwide and long-range character of environmental problems" (42 U.S.C. 4332(2)(F)). The Air Force attempts to block this analysis by improperly construing the Jackson amendment to the 1982 Defense Appropriations Act. This completely subverts the intent and the letter of NEPA. The Air Force's refusal to analyze the real issue demonstrates bad faith. Although it would be difficult to analyze the environmental risk posed by the increased threat of nuclear war, it could be done using existing scientific data and methodology. The difficulty and speculative nature of the analysis does not excuse its completion. The CEQ regulations require it (40 CFR 1502.9(a) and 1502.22).

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Even with the narrow range of issues considered by the Air Force, the DEIS identifies significant impacts on biological, cultural, and human resources from the selected deployment plan (fig. 3.0-1). This alone should trigger an intensive evaluation of alternatives to avoid these impacts. This has not

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been done. In fact, no alternative has been identified that avoids significant impacts on biological resources and threatened and endangered species. This demonstrates that the no action alternative should be seriously considered, yet the no action alternative is not even evaluated and compared in total with other the alternatives (see fig. 3.0-2).

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Had the Air Force performed a satisfactory impact analysis, additional impacts would likely be found to be significant, as shown in section III.F of our comments and in the comments submitted by supporting organizations. Thus the proposal and its alternatives are even less worthy of consideration, and a new DEIS should be prepared that thoroughly evaluates and compares other alternatives, including no action, that would reduce or avoid these impacts.

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It is not unreasonable to expect this range and detail of analysis in an EIS. It is standard procedure for other Federal agencies. It would not introduce excessive delay to the project, should the ultimate decision be to proceed. Western Solidarity does not make these comments with the intention of causing needless delay. Instead we base our comments on our faith that the legally-constituted process required by NEPA will end in the right decision. We fully expect that a full and fair NEPA analysis will show that the MX should not be built—not anywhere, in any mode, and certainly not as the Air Force has decided to build it. Nevertheless, we place our trust in proper process, and would not prejudice the decision as the Air Force has done.

III. THE DEIS DOES NOT MEET NEPA REQUIREMENTS

The EIS required by NEPA is the citizens' only assurance that the environmental laws and policies of the nation will be met by the Air Force. The EIS provides a means for intelligently weighing the benefits of the proposal against its environmental, social, and economic costs. In order to meet the minimum requirements of NEPA, the EIS must evaluate all reasonable alternatives to the proposal in comparative form, adequately assessing the impacts of each alternative. The EIS should demonstrate that all required consultations with affected Federal, State, and local agencies have been performed, so that the public can be assured that all applicable laws and regulations have been met. The EIS should also include a full cost-benefit analysis, including quantification of environmental amenities to the extent possible, so that the merits of the proposal and its alternatives can be meaningfully compared. The following discussions demonstrate that in its hurry to meet its deadline, these requirements were not met. Before proceeding with its proposal, the Air Force should prepare and circulate a revised DEIS that meets the requirements of NEPA.

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A. The Proposed Action is Improperly Defined

The proposed action is nominally the replacement of 100 Minuteman missiles with 100 "Peacekeeper" (MX) missiles (DEIS p. 1-1). However, the DEIS indicates that the Air Force has already selected this alternative. Indeed, funds are already being committed to the project and the first missiles have been built and tested. This patently violates NEPA and the CEQ regulations. The Air Force's commitment to its chosen plan underlies many of the problems of the DEIS, notably its limited range of alternatives and its confusion of mitigation measures with alternatives.

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Proper definition of the proposal is essential if the EIS is to serve a useful purpose. See 40 CFR 1502.4(a). If the Air Force's proposal is truly the replacement of Minutman with MX missiles, then alternatives to that proposal would presumably include other modifications to the current Minutman system to achieve the stated aim of improving the nation's deterrent force. This is not done. The Air Force claims that the Jackson amendment to the 1982 Defense Appropriations Act exempts it from review of the MX under NEPA (DEIS sec. 1.3). The Jackson Amendment states that the report submitted to the President on alternative basing modes and technical alternatives to the MX is not subject to NEPA requirements (emphasis added). This does not exempt the proposal itself from review under NEPA, as the Air Force alleges (DEIS p. 5-1, para. 3 and p. 1-5).

Had Congress intended to exempt the MX itself from NEPA review, it would have clearly stated so. The amendment exempts only the report of the President from NEPA as a recommendation for legislation, as envisioned by the CEQ regulations. The Air Force has conspicuously altered the wording of the amendment to include the "...President's report and proposals..." under the NEPA exemption (DEIS p. 1-5). This goes beyond the intent of the amendment, and it arbitrarily limits the scope of the alternatives considered. Alternative basing modes and deployment locations are the true alternatives to the proposal, and should be evaluated in the DEIS.

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Regardless of whether the Jackson Amendment lawfully exempts the Air Force from NEPA, they have agreed to prepare one to meet the requirements of NEPA and the CEQ regulations (DEIS 1-1; Interstate Compact between Nebraska, Wyoming, and the Air Force). Having agreed to do an EIS, the Air Force must now write one that meets all EIS requirements. Moreover, the Department of Defense regulations (32 CFR Part 989) require the Air Force to follow NEPA procedures and the CEQ regulations. Thus the Jackson amendment does not apply, and the Air Force should issue an EIS that fully complies with NEPA.

Although Congress has appropriated money for the MX, the President and the Executive Branch are not required to spend it. NEPA has not lost its purpose in this instance, should the Air Force comply with NEPA and reissue the DEIS.

B. The DEIS Does Not Evaluate All Reasonable Alternatives

The alternatives identified and evaluated in the DEIS are merely alternative ways of implementing the selected basing mode, and as such are not true alternatives to the proposal itself. While it is useful to examine these localized subalternatives and mitigating measures, they do not substitute for the alternatives analysis required under NEPA. All reasonable alternatives must be evaluated, regardless of whether the Air Force believes they are necessary, feasible, or within their jurisdiction (40 CFR 1502.14). In its EIS on the proposed racetrack basing in Utah, the Air Force did, for example, examine national security issues. Lacking such an analysis, the DEIS is meaningless, and cannot be properly reviewed by the public and the decision-maker. The Air Force should therefore prepare a new DEIS that properly defines the proposal and evaluates all reasonable alternatives to that proposal, as required under 40 CFR 1502.9(a).

A full range of reasonable alternatives is necessary if the EIS is to be useable for decisionmaking (40 CFR 1502.14). The DEIS omits any discussion

and analysis of several reasonable alternatives, and improperly discusses the no action alternative.

The no action alternative is an integral part of any EIS analysis, as recognized in the CEQ regulations (40 CFR 1502.14(d)). The Air Force cursorily dismisses this alternative in chapter 3 of the DEIS without the required detail needed to permit comparison with the other alternatives. Taking no action is briefly discussed resource-by-resource, and nowhere is it displayed, evaluated, and compared as an integral alternative. It is missing from Figure 3.0-2, which is the only side-by-side comparison of alternatives in the DEIS. This omission is critical and makes the DEIS inadequate for decisionmaking purposes.

Other alternatives which should have been evaluated and compared include deferring action pending the detailed studies needed to resolve uncertain and speculative impact analyses, as envisioned under 40 CFR 1502.22.

76 The lack of any alternatives to the proposed deployment mode itself is a serious omission, as discussed above. Alternative ways of modernizing the nation's nuclear deterrent without deploying a missile with first-strike capability are reasonable, and should be examined in the EIS. These might include the small land-based ICBM envisioned by the Scowcroft Commission, sea-based missiles, or other alternatives.

C. The DEIS Lacks a Meaningful Comparison of Alternatives

As shown in the preceding sections, the alternatives presented in the DEIS are excessively limited and do not meet the minimum requirements of NEPA. The alternatives that are presented are not meaningfully compared, as required by NEPA. The analysis of alternatives is the heart of the EIS, according to CEQ. The EIS must "...present the environmental impacts of the proposed action and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice..." (40 CFR 1502.14). This is ordinarily done in the chapter entitled "alternatives including the proposed action" found in most Federal EIS's, unless a different format is used for a compelling reason (40 CFR 1502.10). The DEIS contains no such chapter and no such analysis, nor does it explain why a different format was used. They is a key failing, and by itself renders the EIS impossible to review.

36 The analysis of the impacts of the alternatives is found in chapter 3 of the DEIS. There, the analysis focuses on the impacts of the proposed action, and contains only a very sketchy verbal description of the impacts of the alternatives--generally a few sentences per resource area. There is insufficient supporting evidence and reasoning to support the conclusory statements in this chapter. For example, impacts on biological resources are shown to be significant (fig. 3.0-2), regardless of the alternative chosen. One would expect considerable analysis leading to this conclusion, and certainly a detailed comparison of the alternatives so that the decisionmaker and the public could make a reasoned choice among them, as required by 40 CFR 1502.14 (a) and (b). Instead, the discussion presented is conclusory and no narrative comparison is given (see DEIS p. 3-238).

The only comparison of alternatives is found in fig. 3.0-2, where impacts are presented as solid or open circles of varying size. This would be useful

as a graphic summary to support a detailed narrative comparison of the alternatives, but no such narrative is presented. The CEQ regulations require "substantial treatment...so that reviewers may evaluate their comparative merits" (40 CFR 1502.14(b)). At a minimum, such narrative comparison would aggregate the impacts of each alternative in a discussion that sharply defined the differences in impacts between each alternative. The decisionmaker and the public must be able to understand from the EIS which combination of cable paths, roads, and staging areas would have the least or greatest environmental, economic, and social impact. Instead, the impacts are presented separately by resource and by alternative, so that the reader must aggregate 65 the impacts. This is virtually impossible, given the complexity and size of the document; moreover, it is the agency's responsibility to perform this analysis. The aggregation of impacts that is done in chapter 3 is done by resource, which is useless for purposes of comparing alternatives.

D. The DEIS Fails to Disclose the Full Scope of the Project

The selected deployment plan analyzed in this EIS is closely related to other actions which should be analyzed in the EIS. The purpose of the selected deployment plan is to improve the nation's strategic deterrent force and remedy the supposed vulnerability of the deterrent force (DEIS sec. 1.2) The selected deployment plan cannot achieve this alone; the MX missiles will be just as vulnerable to attack as the existing Minuteman missiles. The selected deployment plan meets its purpose only if combined with the related actions of hardening missile silos, installing an anti-ballistic missile system (ABM), or deep basing of the missiles. Superhardening was discussed at length in the DEIS (p. 0-14, sec. D-1), indicating that such actions are being considered by the Air Force. Silo hardening was envisioned by the Scowcroft report, which states (p. 21--emphasis supplied):

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> a. Engineering design should be initiated now, of a single warhead ICBM weighing about 15 tons; this program should lead to the initiation of full-scale development in 1987 and an initial operating capability in the early 1990s. Deploying such a missile in more than one mode would serve stability. Hardened silos or shelters and hardened mobile launchers should be investigated now.
>
> b. One hundred MX missiles should be deployed promptly in existing Minuteman silos as a replacement for those 100 Minuteman and the Titan II ICBM's now being decommissioned and as a modernization of the force.
>
> c. A specific program to resolve the uncertainties regarding silo or shelter hardness should be undertaken, leading to later decisions about hardening single-warhead ICBM in hardened silos or shelters. Vigorous investigation should proceed on different types of land-based vehicles and launchers, including particularly hardened vehicles.

This makes it clear that the selected deployment plan does not stand alone. Other protective measures are clearly necessary parts of the proposal, and must be examined in the EIS. This is required under 40 CFR 1502.4(a)and 1508.25(a)(1).

Western Solidarity is concerned that the Air Force plans to make Wyoming and Nebraska an attractive target to Soviet attack--a sort of "nuclear sponge" to spare more populated areas. We in the West have seen this mentality before with Federal energy development efforts that would have turned the intermountain West into a national sacrifice area. The Air Force should fully forecast all interrelated deployment plans for the region so that their cumulative environmental impacts can be clearly understood. This is a central 35 requirement of NEPA.

Abundant NEPA case law forbids agencies from "piecemealing" decisions, that is, examining segments of a larger project in order to play down the impacts of each segment. Regardless of the Air Force's Jackson Amendment defense, the current proposal to deploy the MX must be fully reviewed under NEPA along with the closely connected subsequent actions designed to protect the MX. This is so regardless of whether the Air Force publicly acknowledges plans for subsequent actions.

The most efficient way for the Air Force to examine the localized impacts of the proposed deployment plan in the context of related actions would be to issue a programmatic EIS on alternative means of improving the nation's strategic deterrent force, which is the purpose of the current action (DEIS 6 sec. 1.2). A programmatic EIS would identify and evaluate all reasonable alternative means of accomplishing this goal, comparing the environmental and social costs of each. The programmatic EIS should consider, among other options, the alternatives discussed in the Scowcroft Report, including ABM deployment, deep basing, superhardening of silos, and possible deployment of fewer or greater numbers of MX missiles in different locations. Without such a programmatic EIS, the Air Force and the public cannot understand the relation of the current deployment plan to other connected actions or possible alternatives to those actions.

E. The DEIS Lacks a Cumulative Analysis

The DEIS as written is essentially a site-specific analysis of impacts from the selected deployment plan. As such, it must be based on adequate analysis of cumulative, synergistic impacts. It must comprehensively analyze all significant impacts whether or not they may be confined to the project area. The DEIS lacks a comprehensive, cumulative analysis, which is required 53 under NEPA and the CEQ regulations, and so the EIS is flawed as a decision document.

A comprehensive analysis would include impacts of the production, testing, and transportation of the MX. The missile is manufactured in Utah and California, tested in California, and shipped overland to the deployment area. The nuclear warhead and components are made in Massachusetts, Colorado, and Texas and then are shipped to the deployment areas (see attachments to Reid letter). Great sums of money and large labor forces are involved in the production and testing cycle. This carries with it social and economic effects that have not been addressed in the EIS, but may well be significant. 107 For example, the huge capital costs of the MX are a severe drain on the U.S. economy at a time when development capital is critically needed and is in short supply. The effect on inflation of the MX's contribution to the national debt may be significant. The psychological effects on workers who 40 are involved in building this deadly weapon need to be analyzed. Localized

effects on labor forces, social and political institutions, public services, and the economy in the affected communities should be addressed. The MX may 53 have effects on construction workforces as far south as Denver; this needs to be addressed in the EIS. The DEIS does not analyze in sufficient detail the potential impacts on Colorado. In view of the unanimous request of Colorado's Congressional delegation for hearings on the project, this is a major deficiency.

The MX is a unique project by its very magnitude and nature. It calls for the most thorough possible environmental analysis, unconstrained by the Air Force's narrow focus on the deployment area. The possible consequences of the 75 MX's deployment are so severe, and so difficult to forecast, that every effort should be taken to account for all possible contingencies and points of view. Only in this way can the nation be assured that the decision is wise, and that no feasible alternatives have been ignored.

The DEIS should include a cumulative analysis that examines the impacts of the MX in the context of other current and projected development in the deployment region. The region is currently experiencing an energy boom that, although currently in hiatus, shows every prospect of continuing. Impacts of the MX should be examined as they add to or interact with impacts from existing and projected coal, oil, uranium, and other exploration and development. This requires projections of baseline conditions, intelligent speculation about possible development over the lifetime of the project, and 230 analysis of how the impacts of the MX would relate to the impacts of other development. Only in this way can the overall cumulative impacts be understood, and possible interactive or synergistic impacts be identified. This is essential to an informed impact analysis.

For example, the DEIS should forecast population growth under alternative scenarios of energy development and add to that growth (or decline) the population influx and decline from MX construction and operation. From this aggregation impacts can be forecast on social and economic conditions that depend on population changes. This analysis also makes it possible to consider the alternative of deferring the decision so as to time the population impact from the MX to blend in with the impact from other construction projects so that sharp, disruptive fluctuations are avoided.

The DEIS should examine potential impacts from abandonment of the MX project. This is not idle speculation, as every major Democratic Presidential candidate has publicly opposed the proposed MX deployment, and a change in 118 administration during the project is possible. The economic and social consequences of sudden project termination could be severe, not only on the contractors and their workers, but on local communities that must invest in public facilities and services in anticipation of population growth. Sudden halts to large energy projects in the intermountain West have caused severe impacts on workers, local communities, and in some cases, the project environment itself, when proper shutdown measures were not funded or were not followed. The DEIS should examine the effect of project termination regardless of whether the Air Force thinks it is likely to occur.

F. The Analysis of Impacts is Inadequate

1. The Air Force Relies Excessively on Mitigation Measures

Although mitigation measures are an important part of any environmental protection program, they do not substitute for proper design and selection of alternatives to avoid impacts in the first place. The DEIS shows that the Air Force relies on mitigation measures to prevent adverse impacts. Mitigation cannot substitute for choosing an alternative that minimizes adverse impacts. Further, the mitigating measures themselves are poorly designed.

For example, the Air Force relies on on-site monitoring of construction activities to minimize impacts on biological and cultural resources. The Air Force assumes that a specialist will be present to locate threatened and endangered species habitat or cultural resource sites as they are discovered (DEIS p. 3-236). This is not an acceptable strategy. The specialist cannot be expected to discover all sites under the pressure of construction. If he or she does, there is no guarantee that construction will be stopped in time to protect the resource. The time to choose appropriate road and cable locations is before detailed design and route selection has occurred. This requires intensive site investigation by qualified personnel. Only then can a reasoned choice among alternatives be made, as required by NEPA. Complete surveys prior to construction are required in order to find the best route. Without surveys of both the preferred and alternative routes, there is no way to compare the impacts choosing different routes. Full surveys are required for a knowledgable decision, especially in regard to the critical biological and cultural resources known to exist in the project area.

38 The impact analysis is based on the erroneous assumption that the required mitigations will work, but the monitoring program itself is deficient. Adequate monitoring requires that appropriate standards be established that will trigger project modification when they are exceeded. It requires reliable on-site measurement by trained people, who are adequately funded to do their job. And it requires an agreed-upon means of promptly stopping construction once violations are found. None of these requirements are met by the Air Force's assumed monitoring program.

2. The DEIS Ignores the Major Impacts of the MX

37 The greatest potential impact of the proposed action is the increased threat of nuclear war posed by deployment of the MX. The environmental consequences of even a limited nuclear war are staggering. The significance of such impacts dwarf the impacts identified in the EIS. Two respected scientific commissions have recently issued reports documenting the calamitous effect of nuclear war (the reports of the Office of Technology Assessment and the Ehrlich-Sagan study). We will not belabor the obvious point that nuclear war would be devastating. The point that apparently escapes the Air Force is that the MX would increase the threat of nuclear war. NEPA requires that "all agencies of the Federal Government shall recognize the worldwide and long range character of environmental problems..." (42 U.S.C. 4332(2)(F)). Those impacts are documented in the attachments submitted separately by Andrew Reid for Western Solidarity, which we incorporate here by reference.

Although the Air Force does not believe that the MX would increase the risk of nuclear war, the DEIS presents no rationale in support of its conclusion. Further, the Air Force must present all major points of view on the environmental impacts of the proposal and its alternatives (40 CFR 502.9(a)). The contention that the MX would make nuclear war more likely is reasonable and should be presented in the EIS along with its environmental implications.

37 The Air Force's defense that the effect of nuclear war is outside the scope of the analysis is incorrect, as shown in sections III.A and III.B of our comments. Their defense that such an analysis would be speculative is also incorrect. Under 40 CFR 1502.22, the Air Force must make every effort to perform essential analyses, and where there is insufficient information to perform the required analysis, a worst-case analysis is required.

The DEIS does not discuss other impacts of the proposal which must be addressed if the document is to meet the most basic requirements under NEPA. These include:

117 . The effect on Federal environmental and social programs which cannot be properly funded because of the enormous cost of the MX and its closely related associated weapons systems.

. The economic effects of the drain on available capital caused by the cost of the MX.

40 . The psychological impact on the people of the nation who fear the increased risk of war posed by deployment of the MX.

166 . Safety hazards involved in transporting the nuclear warhead and other explosive materials to the deployment area. The DEIS cursorily discusses safety hazards only in the deployment area and neglects the entire transportation route. See DEIS sec. H-4 (p. D-16) and sec. K-1 (p. D-17) which identify hazardous materials that would be transported.

Such analyses are appropriate parts of this EIS because they directly relate to the planned deployment of the MX. The difficulty of performing the required analysis does not excuse its completion. The potential consequences of a mistaken decision are so extreme that the most exhaustive analysis is warranted before taking any action that could increase the threat of nuclear war.

3. The Impact Analysis is Too General

36 The DEIS is too general about the effects of the proposed action and the alternatives. Greater quantification of impacts is needed. Impact methodologies must be summarized in the EIS itself and not merely referenced to technical documents on file with the agency. The EIS must present sufficient information to permit an informed decision. This is not an unreasonable requirement; EIS's prepared by other Federal agencies include quantification and disclose the methodologies used. In many cases conclusions of impact in the DEIS are not based on sufficient data, including field studies, thorough literature searches, and consulting with affected agencies and individuals

36 with expertise in the resource. This is especially true for cultural and biological resources as discussed below.

4. The Impact Analysis is Technically Deficient

64 Despite the bulk of the DEIS, and the occasional useful analysis, much of the technical analysis is faulty. This is not surprising considering the insufficient time allotted to EIS preparation and review by the Air Force, the admittedly inflexible deadline for issuing the FEIS, and the faulty assumptions they specificy for the analysis. Western Solidarity does not have the time or staff to thoroughly critique the technical analysis in the 1 month given for public review (we received our copy October 25). The following deficiencies are, however, illustrative of the general problems of the analysis.

Some of the questions that should have been examined in the DEIS and should be examined in a revised draft EIS are contained in the comments referenced herein (see attachments to Reid letter), which we endorse and which are incorporated into our comments by reference. In addition, the following issues have been inadequately addressed in the EIS:

a. Safety

185 The increased safety zone required by the MX would potentially require the relocation of nine or more families, relocation of a large power plant, and closing or relocation of numerous public roads. The Air Force is attempting to persuade some families to sign waivers allowing them to remain within the danger zone. Setting aside the illegality of any waiver that involves a taking without compensation, the obvious psychological impact of living in the danger zone of the missiles has been slighted in the DEIS. The DEIS identifies only a preliminary zone of safety, which might have to be expanded after further study and experience; this could greatly increase the numbers of families affected and is a potential impact that should be addressed in the EIS. The 187 environmental consequences of moving or closing a major power plant and numerous public roads, including State and Federal highways, are undeniably 188 tremendous, yet they have not been considered in the DEIS. Nor has the risk to the general public of using roads permitted to remain within the danger 190 zone (and which are thus subject to increased danger) been considered. Department of Defense directives and OSHA regulations (cited on p. 1-29 of the DEIS) require a final determination of the safety zone and not the preliminary determination used in the EIS.

165 The discussion of potential safety hazards from handling and storage of the nuclear warhead, explosives, propellants, and other hazardous materials 163 used in construction and operation is inadequate. The DEIS (sec. 1.6.10) dismisses potential impacts as remote. Because the consequences of an accident would be so severe, the Air Force must include additional quantification and analysis of this potential impact, or include a worst-case analysis as required under 40 CFR 1502.22.

b. Cultural resources

1248 The DEIS predicts potentially significant impacts on cultural resources. This alone should trigger a detailed on-site investigation of the potential

1248 impact area to discover all potential cultural resource sites, before project approval. This is required under 40 CFR 1502.2(b), which directs that impacts be discussed in proportion to their significance. Absent such an investigation, the EIS analysis is inadequate. Proposed mitigation measures identified in the EIS do not substitute for the required analysis because they are too general and because they come after the siting decision is made.

1257 The Air Force's consultation requirements under the National Historic Preservation Act and the Native American Religious Freedom Act have apparently not been met. Under the NHPA and under Executive Order 11593, all historical and archeological sites that could be impacted must be located and inventoried, and those that are of historic or cultural importance must be nominated for listing on the National Register of Historic Places. Consultations with all State Historic Preservation Officers must be completed; this apparently was not done in Colorado, which is within the impact area. Under the Historic and Archeologic Data Preservation Act of 1974, the Air Force must consult with the Secretary of the Interior regarding the eligibility of sites so that necessary data recovery efforts and surveys can be conducted. This act requires complete surveys of affected areas, not just a preliminary survey as the Air Force has done.

The failure of the Air Force to perform all necessary surveys, inventories, eligibility determinations and consultations not only violates law, it risks causing unacceptable impacts to historic and cultural resources. The Air Force's reliance on assumed on-site monitoring is not good enough.

c. Biological resources

1433 The DEIS identifies significant impacts on threatened and endangered species. This should trigger detailed site inventories, thorough EIS analysis, and consultations with State and Federal wildlife agencies, as required by 40 CFR 1502.2(b). The Air Force's failure to do so is telling, and violates the protection given such species under the Endangered Species Act. The Air Force also has not conducted sufficient on-the-ground inventories to 1407 locate sensitive plant species and critical wildlife habitats, and has not performed the required consultations with wildlife agencies to obtain their data and expertise. This alone violates the Fish and Wildlife Coordination Act and the Migratory Bird Treaty Act (see sec. IV). It also violates NEPA: lacking such detailed inventory and analysis, the alternatives cannot be compared in a meaningful way. A proper analysis should include, among other things, on-the-ground survey techniques as well as flight surveys using qualified personnel, and accepted modeling and predictive analyses to determine the range of possible impacts on threatened and endangered species and other wildlife and plant species. This was apparently not done; see comments of Dr. Ronald Weeden which document that no botanical field surveys were performed in Nebraska, and that inadequate literature review was substituted. The DEIS needs to disclose the methodologies used.

1422 Comments submitted by the Wyoming Natural Heritage program document the impact that has already occurred on the Colorado Butterfly Plant, a candidate endangered species, from road construction by the Air Force in the project area. The DEIS gives no indication that similar impacts will not be repeated, given the lack of sufficient inventory of botanical resources and monitoring of construction activities.

d. Human resources

77 The DEIS does not adequately show how local communities will be affected by the MX. This makes it impossible for local agencies and officials to plan for and cope with human resource impacts. Additionally, it limits the usefulness of the EIS as a decisionmaking document--its central purpose under NEPA.

The DEIS analysis focuses on impacts on human service agencies. At issue are people themselves; just because an agency can meet its normal case loads does not mean that no impacts are occurring. The primary impacts are on residents. Only when people are hurting will some of them turn to the agencies that serve them. Thus the EIS methodology underestimates human resource impacts. For example, the impact of powerplant construction on Wheatland, Wyoming did not all show up at human service agencies. During peak construction, 3.5 percent of area residents used the mental health center (Dr. Tom Boughsty, written commun., Nov. 1983). The best research available showed that over one-third of the residents needed mental health services, thus the data from the center underestimated the actual problem by 10-fold. Impacts leading to alcohol abuse were even more seriously underrepresented by clinical data. Only one in every 48 men admitting an alcohol-related problem sought treatment.

Only direct monitoring of residents would truly uncover the magnitude of social problems caused by boomtown construction. If the Air Force is not prepared to conduct that analysis, it must include a reasonable, documented worst case analysis as required under 40 CFR 1502.22. That analysis should also account for the unusual nature of the proposed MX deployment. It would attract substantially different construction workers than the energy projects common to the Northern Plains. This raises the potential for more severe
533 impacts, comparable to the effects of the first large projects in the late 1960's. The impact area has had over a decade to adjust to and plan for energy development projects, and the Federal and State agencies regulating those projects have learned how to anticipate and mitigate impacts. The region would to some extent have to start from scratch in learning how to deal with MX construction activities. This would increase the potential for adverse impacts. The DEIS should be revised to correct this underestimation of impacts.

The discussion of impacts on human well-being is confined largely to population-related social pressures. Better analysis of qualitative impacts is needed, including psychological factors. The DEIS should address the profound effect on local residents of living close to the deployment area, which is both a military target and a symbol of imminent disaster. Such effects are real and deserve full consideration in the EIS. Similarly, the
478 DEIS discounts psychological impacts on relocated families and members of the public who must regularly travel on roads in the danger zone. Monetary compensation can only partially mitigate the psychological effect of losing one's home.

429 The DEIS should identify all groups and individuals that stand to lose (economically or otherwise) from MX deployment. A compensation plan should be developed to ensure that individuals do not unfairly bear the brunt of MX deployment.

e. Geologic resources

The DEIS does not sufficiently examine the possibility of an earthquake damaging the silos and causing ignition or spillage of hazardous substances. The conclusion that an earthquake would be remote is inadequately documented (DEIS p. 3-254). Recent seismic activity in the area requires serious
1471 analysis. At least two fault systems are located in or near the deployment area (Wheatland-Whalen and Bordeaux-Hyannis-North Platte). Analysis based on past seismic data is by itself not sufficient; because of the relatively few data points on which to base reasonable projections of seismic activity, a worst-case analysis is also warranted.

f. Economic conditions

The impact analysis should evaluate the many secondary and interconnected effects of MX deployment on the economy of the region. There are typically many hidden costs of projects that appear to bring economic benefits: for
428 example, increased competition to local businesses, the difficulty of stocking inventory to meet unpredictable demands, localized inflation which hurts people on fixed incomes, the uncertainty faced by local governments in planning for impacts which may or may not occur, and the "front end" costs incurred by local governments in anticipating demand for public services.

574 Specific deficiencies in the DEIS's analysis of impacts on local government services in Cheyenne are documented in the comments prepared by the Mayor's impact team. These deficiencies should be corrected in the revised DEIS prepared by the Air Force.

g. Water resources

The DEIS does not adequately address the impact of increased water use induced by the proposal. According to the Air Force's technical report on
1347 water resources that supplements the DEIS (p. 3-92), the project will increase water demand in Cheyenne by 730 acre-feet in 1990. Without mitigating measures, this would result in a water shortage of 190 acre-feet, instead of the 540 acre-feet surplus projected without the project. The report also
1295 states that this may interfere with the availability of water to existing
204 users. The DEIS does not evaluate alternative sources of water in sufficient
206 detail to assess their feasibility. For example, would owners of water rights be willing to sell or lease them? Is condemnation a legal option, and if so, what impact would it have? What modifications to the existing water system would be necessary, and what impacts would they have?

1357 The Air Force admits that existing data are not sufficient to predict site-specific impacts on the Cheyenne well field (technical report, p. 2-11). This field is in a designated ground water control area and is already overstressed. Without the necessary data, impacts on existing and potential water users cannot be meaningfully assessed.

1358 The Air Force assumes that water for construction activities will be obtained by drilling new wells (technical report, p. 3-91), but that their location cannot be defined at present (p. 3-6). New wells may be drilled away from the project area (p. 3-91). Without this information, the impact assessment cannot be performed.

1359 The Air Force acknowledges that data on ground water flow patterns, regional aquifer characteristics, and water quality are not sufficient to predict site-specific changes in ground water levels from project wells (technical report p. 2-10). The impact analysis in the DEIS cannot possibly be useful if it is based principally on speculation and not on modeling using local ground water data. The Air Force should obtain the necessary data on which it can base reasonable impact predictions and present its analysis in a revised DEIS.

5. The DEIS Does Not Disclose Conflicting Viewpoints

The CEQ regulations (40 CFR 1502.9(a)) require that all major points of view be disclosed at appropriate points in the DEIS on the environmental impacts of the proposed action and its alternatives. The Air Force gives a nod to opposing points of view in Appendix D, but only to dismiss them. The impact analysis itself shows a singleminded devotion to the Air Force's point of view. This is not the reasoned, objective evaluation required by NEPA.

There are serious, legitimate opposition viewpoints to the MX and to the
75 Air Force's impact analysis. These are not the views of extremists, but instead represent the mainstream of American thinking. Elected officials voicing opposition to the proposed MX deployment plan include Nebraska Governor Kerrey, Nebraska Senator Exon and Representatives Bereuter and Smith. Governor Lamm of Colorado has expressed his serious concern about the MX in requesting hearings in Colorado. The list of organizations opposing the MX (see Preface) includes groups both liberal and conservative. These leaders and the people they represent deserve an impartial analysis divorced from the Air Force's insistence on pursuing its plans.

IV. REQUIRED CONSULTATIONS HAVE NOT BEEN PERFORMED

The Air Force is required under NEPA to take into account all relevant conservation statutes before adopting a proposed action. The Air Force has failed to meet its obligations under:

- The Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), the Fish and Wildlife Coordination Act of 1958 (16 U.S.C. 661 et seq.), and the Migratory Bird Treaty Act of 1976 (16 U.S.C. 703-711)
- The National Historic Preservation Act of 1966, the Archeological Resources Protection Act of 1979 (16 U.S.C 470 et seq.), the
1444 Historic Sites, Buildings, and Antiquities Act of 1935 (16 U.S.C. 461 et seq.), the Historical and Archeological Data Preservation Act of 1974 (16 U.S.C. 469 et seq.), and Executive Order 11593 (1971)
- The Resource Conservation and Recovery Act of 1976 (42 U.S.C. 4901 et seq.
- The Clean Air Act (42 U.S.C. 1857 et seq., as amended)
- The Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.)
- The Noise Control Act of 1972 (42 U.S.C. 4901 et seq.)

- The Earthquake Hazards Reduction Act of 1977 (42 U.S.C. 1857 et seq., as amended).

We endorse and incorporate by reference the comments previously referenced which document these failings.

The CEQ regulations specifically require full discussion in the EIS of how the proposal would affect historic, archeologic, and cultural resources that are protected under the National Historic Preservation Act, and wildlife species that are protected under the Endangered Species Act and the Fish and Wildlife Coordination Act (40 CFR 1502.25). The DEIS predicts significant impacts on cultural resources and threatened and endangered species, making consultation with the agencies of jurisdiction mandatory. The DEIS does not show how the Air Force's EIS analyses have been integrated with the surveys and studies required by those acts. The DEIS is not based on a comprehensive wildlife inventory of the entire affected area, nor were all concerned wildlife and historic preservation groups with special expertise consulted. The DEIS does not document the full effect of the proposal on migratory birds, which are protected by law and treaty.

The DEIS does not indicate whether the proposal will violate applicable water quality standards under the Federal Water Pollution Control Act. The potential for violation of those standards remains.

1444 The DEIS does not show that the required consultations under the Native American Religious Freedom Act have been performed. Consultations with Native Americans familiar with the region of impact are required, not just with the tribal councils of the areas affected.

The DEIS does not show that required consultations with State agencies have been performed. There is no reference, for example, to the Nebraska conservation laws administered by the State Department of Environmental Quality. Absent the necessary consultation, we must presume that the proposed action may violate State conservation law. There are numerous State, county, and municipal laws in Nebraska, Wyoming, and Colorado concerning the protection of biological, cultural, and environmental resources; the siting of major projects and facilities; the care of State, county, and municipal roads; noise, air, and water pollution, and the use of water; and State, county, and municipal services. The DEIS fails to discuss these laws, to demonstrate any compliance with them, or to discuss why the Air Force is not going to comply with them. NEPA requires this discussion and the EIS is fatally defective without it.

Until all required consultations have been performed, the DEIS remains a deficient document. The consultation requirements of Federal law serves a greater purpose than simply informing other agencies of the effects of the Air Force's actions. The consultation is necessary in order for the Air Force to be apprised of the concerns of other agencies and to take into account in the EIS the information and expert analysis provided by those agencies. Full consultation is required for the EIS to stand as a decisionmaking document. The Air Force should perform all necessary consultations in the process of revising and reissuing the DEIS.

V. THE AIR FORCE HAS NOT AFFIRMATIVELY SOLICITED PUBLIC COMMENTS

Public review of the EIS is essential if the decisionmaker is to have the most accurate information possible on which to base his choice among alternatives. The importance of public review is recognized by CEQ, which requires the agency to affirmatively solicit comments from interested and affected persons and organizations (40 CFR 1503.1(a)(4)). The Air Force has not met its public involvement responsibilities in preparing this DEIS. This has inhibited full public discussion of the proposal, and renders the EIS analysis invalid. A revised Draft EIS should be prepared with proper public involvement procedures as required by NEPA. A proposal of the magnitude and uniqueness of the MX deserves the widest possible public review with adequate notice given to all interested and affected parties.

The Air Force's refusal to affirmatively solicit wide public review of its proposals first became evident when scoping hearings for the DEIS were announced. Scoping hearings were scheduled from June 27-July 1 in Cheyenne, Pine Bluffs, Wheatland, and Torrington, Wyoming, and in Harrisburg and Kimball, Nebraska. There was less than 2 weeks notice of the time and location of the hearings. Seven hearings were held in five days, preventing Western Solidarity and other concerned citizen groups from adequately preparing local testimony for each meeting. When Western Solidarity objected to this schedule, we were told that the President had a deadline for deployment of December 1986 and wanted no delays. This is patent evidence that the public involvement process--indeed the entire EIS process--is a sham. If delays cannot be allowed, the choice of an alternative has in fact already been made. This violates 40 CFR 1506.1(2) which forbids the agency from taking action that would limit the choice of alternatives. Indeed, the predetermination of the decision renders the entire NEPA process meaningless. It severely constrains any analysis that might introduce delay, and as shown in our comments, much additional analysis is needed.

Public involvement requires that the agency do more than simply announce its intentions and hope that the appropriate citizens and officials are within hearing range. It requires that the agency seek out agencies and individuals with special concern or expertise in the issue, inform them of the proposal, and actively encourage them to comment. This was not done. In Pine Bluffs, city officials were completely unaware of the hearing and had scheduled a crucial budget meeting for that night. Scoping hearings were not held in Colorado, despite requests by the Governor, the entire Colorado Congressional delegation, and the mayor and city council of Fort Collins. The region of impact identified in the DEIS includes part of Colorado, and scoping hearings should have been held there. Similar requests to hold additional scoping hearings in Wyoming and Nebraska were denied. No hearing was held in Scottsbluff, Nebraska, even though it is the largest city in the Panhandle and the center of social services, commerce, and trade for a large region affected by the MX. The MX would be deployed within 14 miles of Scottsbluff. There was sufficient public interest to warrant addition hearings. Over 200 people came to Harrisburg, Nebraska (population 70), some traveling as many as 300 miles from South Dakota's Indian reservations and from Rapid City.

The scoping hearings were conducted in such a way as to intimidate public involvement. The Air Force denied a petition signed by over half the attendees at the Cheyenne hearing requesting that the hearing not be broken

into small discussion groups. Their open hostility to opponents in the audience resulted in commotion that inhibited informed public testimony.

The comment period on the EIS is too short to allow informed public involvement. The magnitude of the project, its controversy, and its potential environmental impact mandate under NEPA a lengthy public review and comment period. Many citizens did not receive their copy of the DEIS in time to review the document thoroughly. The DEIS was officially issued on October 14. The Air Force announced a 45-day comment period, and stated in the DEIS cover letter that no extensions would be granted. The comment period has not been extended despite reasonable requests from Western Solidarity and Congressional representatives.

Hearings were scheduled for November 1-4 in the same towns as the scoping hearings. The regional headquarters of Western Solidarity received its first copy October 25. One month is not enough time to review a 600-page EIS. Western Solidarity received many complaints from people who could not get copies of the DEIS. Consultants for Western Solidarity as well as organizational staff were met with hostility by the officers in charge of distributing the DEIS at Norton AFB. At first we were told that we could not receive the 12 volumes of technical support data on which the EIS is based. This policy was reversed at the November hearings, but this was too late to reasonably review the complex reports.

The hearings on the EIS were confined to a four-day period, with two hearings in different towns on three of those days. Hours for the hearings were 3 p.m. to 8 p.m., which prevented many from testifying. The Cheyenne hearing, for example, ended before all could testify.

The Thanksgiving holiday further subtracts from the time available to prepare comments. It is indeed ironic that many commenters will be finishing their comments on one of the most destructive weapons systems the world has seen on a national holiday of Thanksgiving. If the Air Force faithfully followed its NEPA obligations, it would actively encourage public review instead of discouraging it. Public review, properly sought, helps the agency do its job. Public comment provides the decisionmaker with information that may not be available to the agency. It makes it possible for the agency to make informed judgements of the significance of environmental impacts and to make a reasoned choice among alternatives. Soliciting public comment is important, not only because it is required, but because it serves a vital purpose. The Air Force has subverted this purpose from the time the Scowcroft Commission announced its findings. As a result, the EIS it has issued is fatally undermined and does not fulfill the requirements of NEPA or the implementing regulations in related laws.

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November 21, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFRCE-BMB
Norton Air Force Base, CA 92409

Dear Major Walsh:

Enclosed are our comments on the Draft Environmental Impact Statement on the proposed deployment of the MX missile in Minuteman silos. We hope you will consider our comments carefully in preparing the final EIS. We remain opposed to the production, testing, and deployment of the MX in any configuration; our comments are limited here to the adequacy of the DEIS in examining the environmental impact of the current proposal and its alternatives.

We did not receive a copy of the DEIS until October 24, 1983, after a phone request on October 12. Five weeks is not enough time to review such a complex EIS; we request an extension of the comment deadline and notification of all recipients of the DEIS of the extension. The cover letter to the DEIS does not explain why you do not want to extend the deadline; in view of the importance of this issue to the nation, and the complexity of the DEIS, we believe that a minimum two-week extension, properly publicized, would allow for a more reasonable public review.

Sincerely,

Mary Wilham
Western Solidarity
Helena, MT

Rob Sand
Western Solidarity
Charlo, MT

MWRS:rh

Enclosure: DEIS comments

COMMENTS ON DRAFT EIS,
"PEACEKEEPER" (MX) MISSILE IN MINUTEMAN SILOS
DEPARTMENT OF THE AIR FORCE

Prepared by

Mary Wilham
Helena, Montana

Rob Sand
Charlo, Montana

November 21, 1983

GENERAL COMMENTS

We found the Draft EIS to be generally very readable. We appreciate the analysis of the significance of impacts, and the presentation of explicit criteria for determining significance. The summary was well written, and the summary tables make it possible to overview the impacts at a glance. The abbreviations in the table under "Alternatives" were confusing, however.

Generally the EIS does a good job as far as it goes. Its major shortcoming is that it ignores or slights some key issues regarding the MX missile. We prefer the term "MX" to the Orwellian "Peacekeeper." The EIS should discuss potential impacts related to the increased probability of a nuclear attack, which it ignores under the guise of the Jackson Amendment. The EIS also needs more discussion of safety hazards from installation and maintenance of the MX missile. These deficiencies, along with those identified by other commenters, should be remedied in the final EIS. We hope this can be done without losing the clear (though currently too limited) analytic focus in the DEIS.

COMMENTS ON EIS SCOPE

The Air Force has excessively constrained the scope of the analysis by applying the Jackson Amendment to the Defense Appropriations Act too broadly. The Jackson Amendment does not appear to exempt the MX missile from review under NEPA to the extent the Air Force claims. We feel that all environmental impacts from the proposed basing near the Warren Air Force Base in Wyoming must be reviewed under NEPA. The Air Force has limited its review to known on-site impacts, in particular, the impact of alternative road locations, cable routings and impacts at the staging areas where the missiles would be assembled. Several commenters in the EIS scoping sessions asked the Air Force to consider the potential environmental impacts caused by a first strike, which would be made more likely by the deployment of the MX. The Air Force's response in the DEIS is to assert that the Jackson Amendment exempts this issue from NEPA review.

We feel this is in error and that the Jackson Amendment does not apply to impacts from proposed basing as discussed in this EIS. Therefore, all environmental impacts from the proposed basing, no matter how improbable or speculative, must be addressed in this EIS. In particular, this would include potential impacts caused by a first strike, the general increased risk of a nuclear war from the MX deployment, and indirect impacts resulting from increased military expenditures upon the U.S. economy in general. The failure to discuss these impacts in the draft EIS is a serious shortcoming which must be corrected in the final EIS. The Air Force cannot hide behind the Jackson Amendment in attempting to excessively limit NEPA review of the proposed project. There is nothing in the Jackson Amendment which limits full consideration of on-site environmental impacts from the proposed basing mode and indirect environmental impacts of that proposal.

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COMMENTS ON THE IMPACT ANALYSIS

The draft EIS does examine some of the on-site impacts rather well in particular, the DEIS identifies numerous significant and potentially significant impacts on biological and human resources. For example, the proposed road locations and several other alternatives could have significant impacts on known and as yet undiscovered archeological sites. There would also be significant impacts on threatened and endangered species, both plant and animal. The DEIS also identifies significant short-term impacts on housing, social well-being, public services and facilities, transportation, recreation, and water resources, as identified in figure 3.0-1. All of this shows that even given the Air Force's limited view of the impacts of the MX, there would still be serious impacts on the local environment from this project. This is nothing new. When the Air Force was proposing the racetrack basing mode in Utah and Nevada, the serious impacts of the project there contributed to the decision to seek an alternative basing mode. It may well be that the MX missile is going to cause problems no matter where it is located, and no matter how limited the scope of the analysis.

One shortcoming of the EIS analysis is the failure to determine what we call residual impacts. The analysis does an excellent job identifying some potential impacts and determining their significance and also identifying possible mitigating measures. What it apparently does not do is say what the impacts would be if certain mitigating measures were employed. That is, if the mitigations were adopted, would the impacts still be significant? That analysis is critical if the decisionmaker is to understand what recourse he has to avoid impacts. A residual impact discussion should be added to the final EIS.

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The comparison of alternatives in the DEIS is also very cursory. It appears to consist of the few tables listing the alternatives and showing by means of solid or open dots what the impacts would be on various resources. There is no detailed narrative comparison of the alternatives.

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This is necessary for the decisionmaker to make a reasoned choice between alternatives. This lack of comparative narrative analysis makes it impossible for the reviewers to evaluate the comparative merits of each alternative as required under the CEQ regulations (40 CFR 1502.14). Those regulations require a rigorous exploration and objective evaluation of all alternatives. Although the DEIS evaluates the alternatives separately, it is the comparison of the alternatives that forms the heart of the EIS as required by the CEQ regulations.

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Another shortcoming of the EIS is the failure to identify and evaluate potential worst-case impacts from certain aspects of the proposal; for example, transportation of hazardous materials and potential safety hazards once the missiles are in place.

Section 1.6.10 in the DEIS discusses potential safety hazards but uniformly dismisses those hazards as being exceedingly remote. However, because of the potentially severe consequences of an accident involving the nuclear warhead, the explosive used to propel the missile out of the silo, and other hazardous materials involved in construction and deployment, a worst-case analysis is required. Even if the impacts of such an accident are remote and speculative, the severe consequences of an accident makes it imperative that the worst case be addressed in the EIS.

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The difficulty of doing this analysis does not excuse the Air Force from performing it. Indeed, it makes it mandatory, as provided in 40 CFR 1502.22. The analysis is good as far as it goes -- it simply does not go far enough. Potential impacts of the proposal should not be limited to on-site impacts. It should also examine the entire transportation routes involving transportation of the warhead (presumably from Pantex in Texas) and transportation of other hazardous materials wherever they may come from.

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We could find no discussion in the draft EIS of how the Air Force intends to meet its consultation requirements under the Endangered Species Act and the National Historic Preservation Act. Because significant impacts are predicted on both threatened and endangered species and cultural resources, those consultations are required and critical before this project can proceed. The EIS should describe how the Air Force plans to meet its responsibilities under those two acts.

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In conclusion, we believe that the draft EIS clearly shows that the proposed project would have severe impacts on the local environment. This alone should be sufficient to cause the Air Force to consider other basing modes despite the limitation of the Jackson Amendment. The draft EIS does a good job given the unnecessarily constrained scope of the analysis. The major deficiency of the DEIS, however, is exactly that its scope is too constrained. The Air Force is attempting to hide behind the Jackson Amendment to ignore the very real environmental consequences posed by deployment of a dangerous first-strike weapon.

No matter how the MX is deployed, it will be an inviting target for a first-strike launched by the Soviet Union. That carries with it strong environmental implications no matter how speculative and difficult the analysis

of those consequences might be. It is not enough to say that because the analysis is difficult it need not be done. NEPA requires the best analysis possible, admitting scientific uncertainty and clearly acknowledging guesswork when it is necessary.

We are dealing with a highly speculative issue, but because the consequences of any nuclear warfare in any degree would be so severe, the Air Force must examine those consequences. The issue must be made public. It must be fully aired so that the public understands exactly what is being proposed. Only in this way can all feasible and reasonable alternatives to the proposal be brought to the attention of the decisionmaker.

Without this reasoned comparison of alternatives, no analysis, no matter how careful, can meet the requirements of NEPA.

In a sense, the EIS's detailed examination of minute environmental impacts in the proposed basing area does a disservice to the public. The great length and depth of the analysis obscures the larger issues which have been studiously ignored. It makes it appear as if the Air Force has done a proper job under its NEPA responsibilities when, in fact, it has ignored the key issues.

We hope that you will carefully consider these comments in preparing the final EIS and will examine the issues that have been ignored or slighted in the draft EIS.

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-337

22 Nov 83

314

WYOMING NATIVE PLANT SOCIETY

1603 Capitol Ave. #325
Cheyenne, WY 82001

November 9, 1983

Major Peter Walsh
AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Major Walsh:

Our main comment on the draft EIS for the MX concerns the Colorado Butterfly Plant, a candidate endangered species. The earlier Legislative EIS for basing the MX completely ignored this plant even though it was treated in a publication which was cited in the LEIS several times for other threatened or endangered species in Wyoming. This was simply part of the deliberate slanting in this document to ensure that Warren AFB would be selected for basing the MX. In the present draft EIS we now find that this plant will suffer "Unavoidable Adverse Impacts" including "Permanent...loss of...habitat." According to the EIS, the Air Force has a Memorandum of Agreement with the U. S. Fish and Wildlife Service "for protection and management of this species until it is listed." The EIS continues, "Disturbance to this plant's habitat during construction will result in a high, significant, long-term impact." This is in clear violation of the Endangered Species Act. The Act provides for civil and criminal penalties, including jail terms, for violations, and authorizes citizen suits against the U. S. Government or any of its agencies for any violations. We will expect the Air Force to come up with an alternative that will not destroy the plant's habitat or else obtain an Exemption under the provisions of the Act. 142

In general, there are many proposed mitigating measures listed in the draft EIS, but there are no commitments on the part of the Air Force to follow through with them. The people of this area are interested in commitments, not meaningless words on a ream of paper called an EIS. 90

It is also interesting to note the List of Preparers in Appendix G. Where are the local contractors that the Air Force promised it was going to hire? It seems that the Air Force wants local input only for window dressing. 52

Sincerely,

E. F. Evert
President

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

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COMMENTS OF THE WYOMING NUCLEAR WEAPONS FREEZE COALITION

HEARING ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT: MX IN MINUTEMAN SILOS

Wednesday, November 2, 1983

I am the Reverend Dr. Sally Palmer, testifying on behalf of the Wyoming Nuclear Weapons Freeze Coalition, an organization comprised of nine local Wyoming groups advocating a bilateral, verifiable freeze on the testing, production, and deployment of nuclear weapons by both the Soviet Union and the United States.

Although our time to speak today is limited, we take this opportunity very seriously. As Americans we enjoy great privileges and great responsibilities - in which other countries citizens have the chance to examine and comment on issues such as the proposed MX deployment. This is the essence of democracy, and we are proud to be part of it.

The Air Force says we are to direct our comments to the subject areas outlined in the DEIS - not to the reasons for the proposed MX deployment or related issues. Technical areas such as water resources and schools are important, and we will be supplying written comments on these topics. But today we wish to focus our comments on the overriding deficiencies of this document: its failure to seriously analyze alternatives to the proposed action, including the alternative of no deployment; its failure to describe the impact of MX deployment in vulnerable silos on global nuclear stability; and its failure to consider the new threat that deployment of this weapon will pose to Wyoming residents, including the possibility of nuclear war.

The Air Force's idea of analyzing alternatives is to discuss different cable routes and modifications to the interstate highway. This is akin to discussing the arrangement of the deck chairs on the Titanic. The real issue facing us is - does the United States need the MX deployed in Minuteman silos? Is this action truly the best our country could take? 76

A mere two years ago, our current secretary of defense, Caspar Weinberger, told Congress that putting the MX "into existing silos would not answer two or three of the concerns that I have, namely, that [the location of] these are well known and are not hardened sufficiently, nor could they be, to be of sufficient strategic value to count as a strategic improvement of our forces."

The circumstances Mr. Weinberger spoke of have not changed. The Air Force states in this DEIS that neither superhardening of silos nor installation of a ballistic missile defense system to protect the MX will be done in the "reasonably foreseeable future." We can only conclude that either there are plans for these defenses and we're not being told about them now because the associated resource demands would be significantly greater than for the current proposal, or that deployment of the MX in Minuteman silos is essentially a waste of money.

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For these reasons and many others we believe the Air Force should thoroughly analyze the alternatives to the proposed action, despite their claim that Congress has exempted them from conducting such analyses. This claim is of dubious legality, and in any case does a grave disservice to the people of this region who are expected to live with this missile and have the right to know why.

It's been said that Wyoming residents are used to living with missiles because of the Minutemen. It's absolutely essential to realize that the MX is not just a fancy Minuteman. It is a fundamentally different weapon. With its ten warheads and greater accuracy and destructive power, the MX will have the capacity to destroy missile silos, thereby putting the Soviets in the untenable position of "using or losing" their missiles. On the other hand, by deploying such a valuable target in a vulnerable silo, we will, in the words of the late Senator Henry Jackson (a noted hawk on military matters), "... have given the Soviets a better target to shoot at." We believe the DEIS should examine how the MX deployment will disturb the current nuclear balance between the two superpowers and create greater nuclear instability.

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Although the DEIS states that the MX is needed to deter nuclear war, it also says that the effects of nuclear war are "speculative" and therefore will not be addressed. The effects of nuclear war are far from speculative. They have been documented at Hiroshima and Nagasaki and in numerous tests conducted by the military, as well as scientifically projected from available information about the destructive power of nuclear weapons and the effects of radiation.

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We suspect the real reason the Air Force ignored this issue is they didn't want to say that nearly everyone would be killed and the Wyoming we know and love damaged beyond recognition. Driving over to Laramie or Rawlins, as called for in Laramie County's civil defense plan, will not make much difference. We cannot run away from nuclear war, so we have a right to be informed of the consequences.

Again, we thank you for the opportunity to testify today.

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104 S. 4th Street, Room 205
Laramie, WY 82070
28 November 1983

AFKEB-EHR/DEV
Norton AFB, CA 92409

To Whom It May Concern:

The Wyoming Nuclear Weapons Freeze Coalition wishes to submit the following comments on the Draft Environmental Impact Statement, MX in Minuteman Silos.

We believe this document contains serious procedural and substantive deficiencies, as listed below.

IDENTIFICATION AND ANALYSIS OF ALTERNATIVES TO THE PROPOSED ACTION: Paramount among the deficiencies of this document is the complete failure of the Air Force to identify and analyze alternatives to the proposed action. By "alternatives," we mean alternative MX basing modes and alternative means of meeting our nation's perceived defense requirements, not just alternative cable routes and highway modifications.

Section 1.3 of the DEIS states that the "Jackson Amendment" to the Department of Defense Appropriations Act of 1983 exempts "...the President's report [the Scowcroft Commission report] and proposals from the requirements of the National Environmental Policy Act." The effect of this interpretation is to treat the Scowcroft Commission report as holy writ. The Scowcroft Commission was the third commission appointed to find a home for the MX, and it succeeded only by choosing a basing mode that had previously been rejected as unacceptable. An October, 1981 quote from Secretary of Defense Caspar Weinberger sums up the problem; he told Congress that putting the MX "...into existing silos would not answer two or three of the concerns that I have; namely, that [the location of] these are well known and are not hardened sufficiently, nor could they be, to be of sufficient strategic value to count as a strategic improvement of our forces."

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In any case, we believe the Air Force's interpretation of the Jackson Amendment is unjustifiably broad. The amendment merely exempts the REPORT from NEPA. It does not necessarily exempt actions following from the report, nor does it exempt the Air Force from seriously evaluating the alternative of no deployment, which is presented only superficially in this DEIS. Moreover,

the agreement between the Intergovernmental Executive Impact Council and the Department of Defense calls for completion of an environmental impact statement [section 9(g)] without granting any special exemptions as to its content.

The NEPA regulations refer to examination of alternatives as the "heart" of the environmental impact statement (section 1502.14). The regulations require "full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment" (section 1502.1). Further, "environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made" [section 1502.2(g)]. Unfortunately, this DEIS is nothing but a justification of a decision already made.

In sum, the WNFC believes the Air Force erred in omitting analyses of alternatives to the proposed action - including alternative basing modes, alternative means of meeting U.S. defense requirements, and the alternative of no deployment - and hereby requests the Air Force to supply such analyses in a supplemental draft environmental impact statement before issuance of the FEIS.

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THE MX, ARMS CONTROL, AND THE "WINDSHIELD": Even if one agrees with the Air Force's interpretation of the Jackson Amendment, this DEIS falls far short of legal requirements. The Scowcroft Commission report clearly describes the MX as part of a package:

> "The [Scowcroft] Commission has concluded that the preferred approach for modernizing our ICBM force seems to have three components: initiating engineering design of a single-warhead small ICBM, to reduce target value and permit flexibility in basing for better long-term survivability; seeking arms control agreements designed to enhance strategic stability; and deploying MX missiles in existing silos now to satisfy the immediate needs of our ICBM force and to aid that transition." (p.14, emphasis added)

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NEPA regulations state: "Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement" [section 1502.4(a)].

This DEIS tells us nothing about the single-warhead small ICBM (misnamed "Midgetman"); nor does it tell us anything about arms control agreements. Perhaps this is because Midgetman deployment may cause marked disruptions in

35 land use patterns and resource use in Wyoming and other Western states, which the Air Force would rather not discuss right now. Further, to bring up arms control agreements would be to admit the utter fallacy of the principal argument for the MX - namely, that it will force the Soviets to the negotiating table. The recent Soviet walkout in the INF talks in Geneva demonstrates otherwise.

The reasons for deployment of the MX as stated on page 16 of the Scowcroft Commission report are not sufficiently compelling to force residents of Wyoming and Nebraska to immediately accept these missiles without knowledge of the other two components of the Scowcroft Commission package. First, the MX will not force the Soviets to negotiate, especially if they already have an ICBM capable of destroying hard targets, as the Scowcroft Commission report claims. Second, making the MX a test of our "national will and cohesion" is equally illogical; if over 25,000 nuclear weapons do not currently constitute sufficient deterrence, the MX is unlikely to tip the balance.

Third, 100 MX missiles with their 1,000 warheads will constitute far more than a "controlled, prompt, limited attack on hard targets"; 10 MXs would do for that purpose. Fourth, the Minuteman rehabilitation programs keep that missile a credible part of our defense triad; as Assistant Secretary of the Air Force Dr. Alton G. Keel said in March, 1982, "The Minuteman is fully capable now and should continue to be an effective weapon system through the year 2000, if not indefinitely."

The argument positing a Soviet "breakout" from the ABM treaty carries little weight; an ABM force of any consequence would have to be tested, produced, and deployed, activities which surely would not pass unnoticed by our intelligence satellites. And it is highly unlikely that production of the MX is the most economically efficient way to provide boosters for space satellites.

This "package" concept applies as well to the MX and superhardening and/or ballistic missile defense. Although the Air Force denies that the MX deployment is connected to either of these (section 1.3), the need for superhardening or a ballistic missile defense decreases sharply if the MX is not deployed. If the MX is to be deployed in a vulnerable mode and some form of protection is contemplated for it, then that protection and its associated impacts should be identified and analyzed in this DEIS.

In sum, there is no legal allowance or justification for the Air Force to pick and choose from the Scowcroft Commission report. If the Air Force wishes to ignore all of the above issues and proceed from the Scowcroft Commission report as an unassailable document, as in this DEIS, then the whole package must be examined - including arms control agreements, the "Midgetman," superhardening, and a ballistic missile defense. The WNWFC hereby requests that these related 35 developments be addressed in a supplemental draft environmental impact statement before issuance of the FEIS.

EFFECTS OF MX DEPLOYMENT ON NUCLEAR STABILITY: Another major deficiency of this DEIS is its failure to consider the impact of deployment of a first-strike weapon in vulnerable silos on nuclear stability between the superpowers. Both the DEIS and the Scowcroft Commission report refrain from emphasizing the first-strike aspect of the MX, but the missile does indeed have that capability: "...although it is not one of our goals, it is a fact that the MX program will have some first-strike capability..." (General Lewis Allen, Air Force Chief of Staff, quoted in Science, 7 May 1982).

The implications of this situation are two-fold: first, deployment of the MX in a vulnerable silo may well invite, rather than deter, an attack; and second, the proposed deployment greatly enhances southeastern Wyoming's value as a target 39 in a nuclear exchange.

It may invite attack because the stated purpose of the MX is to "hold Soviet hard targets at risk" - meaning missile silos and command, control, and intelligence centers. There is obviously no point in hitting empty missile silos, so by deploying a weapon capable of destroying such silos, we are telling the Soviets that we are prepared to strike first. With 75% of their arsenal in vulnerable land-based ICBMs, might not the Soviets be tempted to use, rather than lose, a significant portion of the missiles in a time of crisis? The temptation is made that much greater by deploying a target of the MX's value in a well-known, unprotected silo. As the late Senator Henry Jackson put it, we will "...have given the Soviets a better target to shoot at."

The MX is a fundamentally different weapon than the Minuteman, and its deployment near Warren Air Force Base will make Cheyenne and its environs the No. 1 nuclear target in the United States. The MX could easily be a target for some sort of Soviet "warning" strike, especially since the associated population loss would be more "acceptable" than would result from a strike on a major city.

If the Air Force intends to impose such a risk on the residents of this area, then we at least deserve some acknowledgement and analysis of that risk in this DEIS.

Regardless of one's interpretation of the Jackson Amendment, the Air Force should have addressed both of these implications in the DEIS because neither are included in the Scowcroft Commission report. The report dismisses the issue of vulnerability, saying it is covered by the mutual survivability of the ICBM force and the bomber force (p. 17); it does not consider vulnerability from the standpoint of precipitating an attack. There is no mention at all of making southeastern Wyoming and western Nebraska a "nuclear sponge."

39 In sum, the WNWFC believes the Air Force should redress these two deficiencies in a supplemental draft environmental impact statement before issuance of the final EIS.

THE EFFECTS OF NUCLEAR WAR: This DEIS also completely fails to consider the possibility that deterrence may collapse - and southeastern Wyoming and western Nebraska, as the nation's "nuclear sponge," would bear the brunt of a nuclear war.

Section 1.3 of the DEIS dismisses the effects of nuclear war as "speculative," but nothing could be further from the truth. The effects of nuclear war have been painstakingly documented - by the military - at Hiroshima and Nagasaki, as well as at subsequent nuclear tests, and have also been projected by various scientific means. (For example, a conference entitled "The World After Nuclear War", just held in Washington, D.C., generated considerable well-researched infor-37 mation on this topic from prominent scientists.) The available information indicates that even a "limited" nuclear exchange, if one can occur without escalating into all-out annihilation, would cause unimaginable destruction.

Again, this issue was excluded from consideration in the Scowcroft Commission report, so it cannot be considered "exempt" under the Air Force's interpretation of the Jackson Amendment.

In sum, the WNWFC believes that if the Air Force wants to present the MX as a deterrent, it must also examine the possible failure of deterrence and therefore the effects of a nuclear war - or, at the least, the effects of a nuclear strike against the MX missiles deployed in Minuteman silos.

COST OF THE MX PROGRAM: The DEIS did not contain any sort of cost-benefit analysis for the MX deployment in Minuteman silos; the only economic information provided was the anticipated increase in revenue and jobs in the deployment area.
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The overall cost of the MX program has been estimated at $30 billion. It is well known that military spending is inflationary (because it does not produce consumer goods) and generates fewer jobs per dollar than almost any other kind of government spending. In fairness to the city of Cheyenne and other municipalities that will boom - and bust - as a result of the proposed MX deployment, the Air 117 Force should examine the impact of spending the amount of money that would be spent on the MX deployment on developing a permanent economic base for the Cheyenne area instead.

Before issuance of the FEIS, the WNWFC believes the Air Force should issue a supplemental draft environmental impact statement including a cost-benefit analysis of the MX program and an examination of the effect of spending the funds that would have been spent in Cheyenne because of the MX on other forms of economic development.

COMMENT PERIOD: The Air Force set a 45-day comment period for this DEIS - including Saturdays and the Thanksgiving holiday. This is too short for a controversial project of this magnitude, especially since even those who were mailed a copy of the DEIS on October 7 did not receive it until nearly a week later. Despite the short comment period, the Air Force was not very cooperative about supplying 23 additional copies, referring people instead to their public libraries - thereby failing to allow for the long distances and bad weather common in Wyoming, as well as the need for personal copies for individuals unable to take the extra time to make special trips to the library (and then, perhaps, find the library copy or copies in use).

Because of the weather during the Thanksgiving weekend prior to the end of the comment period, several experts engaged by the WNWFC were unable to get their comments in on time. We respectfully request that the Air Force extend the written comment period until December 9, 1983; this extension would provide a comment period of 45 business days.

The WNWFC hereby endorses the comments pertaining to archaeological impacts made by David McGuire and Kathy Joyner.

Your thoughtful consideration of these comments will be appreciated.

Sincerely,

Leona Stafford, Chairm.
Wyoming Nuclear Weapons Freeze Coalition

Sarah Gayle Jones, Chairf
Wyoming Nuclear Weapons Freeze Coalition

Wyoming Nuclear Weapons Freeze Coalition
Comments on DEIS, MX in Minuteman Silos page 7

The Wyoming Nuclear Weapons Freeze Coalition is submitting these comments on behalf of its member groups, including:

Casper Peace Alliance, Casper, Wyoming
Fremont County Freeze Campaign, Lander, Wyoming
Sweetwater County Residents Against the MX, Rock Springs - Green River, Wyoming
Albany County Nuclear Freeze Campaign, Laramie, Wyoming
Platte County Citizens for Peace, Wheatland, Wyoming
Wyomingites Against the MX, Cheyenne, Wyoming
Committee on Defense Alternatives, Sheridan, Wyoming
concerned citizens favoring a Freeze in Gillette, Wyoming

These groups may submit their own comments as well.

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-342

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COMMENTARY AND ANALYSIS
CORDIALLY SUBMITTED
TO THE UNITED STATES AIR FORCE
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
OF OCTOBER, 1983
FOR PEACEKEEPER IN MINUTEMAN SILOS

FROM:

THE WYOMING WILDLIFE FEDERATION
HIRDS BUILDING, CAPITOL AVENUE
P. O. BOX 106
CHEYENNE, WYOMING 82001
307 - 637 - 5933

NOVEMBER 19th, 1983

11-19-83

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Wyoming Wildlife Federation
Nynda Building, Capitol Ave.
P. O. Box 106
Cheyenne, Wyoming 82001
November 19, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFSC - BMO
Norton Air Force Base, California 92409

Dear Major Walsh:

The Wyoming Wildlife Federation appreciates the opportunity to comment on and add to the relevant data you will consider for the final draft of the Environmental Impact Statement (EIS) for Peacekeeper in Minuteman Silos.

The Federation is Wyoming's oldest and largest organization of sportsmen, outdoor enthusiasts, and sportsmen's clubs. We are affiliated with the 4½ million member National Wildlife Federation, our nation's largest association of sportsmen and sportswomen concerned with environmental stewardship.

The Wyoming Wildlife Federation (WWF) is a broadly based, conservative group of Wyoming citizens endorsing consumptive use of natural resources, encouraging a balanced approach to development, and recognizing the need for industry, business, housing, and transportation.

Our board of directors includes men and women from business, manufacturing, construction, professional, educational, energy, timbering, agricultural, outfitting, and sportsmen's groups as active participants in the policies and decisions of the Federation.

We enthusiastically share the common objectives of a solid climate for free enterprise and sound management of our wildlife and natural resources, and we seek to provide counsel and assistance for projects of environmental consequence, in order that these undertakings may be done right and properly the first time, with minimal disruption to traditional wildlife and agricultural activities in our region.

Sincerely,
Tom Dougherty
Wyoming representative to the National Wildlife Federation; Chair., Natural Resources Comm., the Wyoming Wildlife Federation

Major Walsh,

This document is a case study resulting from WWF monitoring of Peacekeeper, as called for in our Federation resolution. We want to point out discrepancies and inconsistencies in the DEIS with the desire of providing constructive insight and guidance for the final EIS.

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THE ROLE OF THE FEDERATION IN THE PEACEKEEPER PROCESS

" Dear Mr. President,

The Wyoming Wildlife Federation resolution on the deployment of MX missiles in Wyoming begins as follows: Whereas, we, the members of the WWF, recognize and support our nation's commitment to strength through preparedness.... "

Thus, a communication to President Ronald Reagan is initiated in w ch Tom Dougherty, WWF representative for Wyoming pledges to " extend our full cooperation and assistance, to help identify and address all areas of environmental consequence, so that mitigation of MX is adequate and construction proceeds in an environmentally sound manner the first time. "

It is in this context, of respect for our government, our national leaders, and our own commitment to this nation's deterrent defense capabilities, that the Federation's commentary and analysis of the Draft Environmental Impact Statement (DEIS) will be here presented.

The role of the Federation in the Peacekeeper dialogue is positive. The WWF is in a unique position to provide advice to the Air Force on wildlife and natural resource matters, because we alone on the spectrum of conservation groups in Wyoming are not opposing MX, but are offering the means of our membership to help ensure an optimum national defense system, with workable environmental safeguards built in.

THE LEGITIMATE CONCERNS OF THE FEDERATION

It is the general concern of the Federation for the traditional care of, and adequate maintenance of, Wyoming's superb wildlife and habitat, precious water resources, rich farmlands and rangelands, the importance of agriculture to the state's heritage and economy, and our special western way of life which centers on hunting, fishing, outdoor activities, and economic pursuits dependent upon the land.

Consequently, the members of the board of directors of the Wyoming Wildlife Federation find the placement in Wyoming of the Peacekeeper system, and any additional systems required to upgrade and defend it, to be a great potential effect on wildlife, natural resources, rangeland, farmland, and the traditional economic and recreational pursuits which comprise our Wyoming quality of life.

In this spirit, the WWF will monitor, speak out publically, and challenge any abridgement of sound environmental stewardship in the building of Peacekeeper in Wyoming.

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RECOGNIZING THE ESSENTIAL REALITY:

BY CONGRESSIONAL DIRECTIVE, PEACEKEEPER MUST BE MADE SURVIVABLE

The Federation, and most Wyoming citizens, are aware that a proper effort to replace a system to defend and backup Peacekeeper has the support of President Reagan and many members of Congress. Central to our commentary is the reliability of the people and institutions which have reported that this is the case.

There appeared in Aviation Week and Space Technology magazine, on January 10, 1983, a study on missile engineering by Bruce A. Smith entitled Future Growth Key To MX Site Selection.

The first few paragraphs of Mr. Smith's findings are included in the Supplemental Data section of this analysis and are as follows:

> Los Angeles - Capability for possible expansion of an MX intercontinental ballistic missile system at Warren AFB, Wyoming, to include more missile capsules for deceptive basing or the addition of a defensive system were major considerations in the siting process that led to the selection of Warren, Air Force officials said.
>
> In the wake of congressional action late last year, Air Force officials have begun gathering data that may be used in reevaluation of closely spaced basing, as well as deceptive and other possible MX basing concepts....

Many of our Federation members are in agreement with the President and Congress in urging that strategic protection be provided forthwith, to ensure the survival of otherwise vulnerable missiles in their silos.

Therefore, because Congress itself has taken steps to address silo survivability of the Peacekeeper program, it is the Federation's determination that the DEIS does not go far enough to prepare for the long-term environmental impacts on the wildlife and people within the deployment area or the Region of Influence For Public Services.

35

The significant absence in this DEIS of a data base to include subsequent studies and recommendations on systems to defend, upgrade, and enhance the survivability of Peacekeeper in Minuteman silos is a monumental oversight which any number some or all of the environmental impact estimates in this DEIS to be short-term, shortsighted, temporary, and perhaps moot.

Nevertheless, we see the Federation's ability to comment on the DEIS as an opportunity to contribute and bridge some of the gaps in the search for the appropriate impact solutions.

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A PROFESSIONAL YARDSTICK:

A MEMORANDUM by Don Dexter, Director of the Wyoming Game and Fish Department addressing the demands for wildlife-associated recreation resulting from human population increases - September 1, 1983
(The full memorandum is enclosed in the Supplemental Data section.)

At this point, the WWF would like to submit a yardstick for recreational demand that is relevant to Wyoming, no matter how large or small the Peacekeeper project may be. Title: MX Impact Analysis & Mitigation Proposal.

To quote Mr. Dexter's testimony:

> ... Based upon the percentage of the population that uses the various wildlife resources, each increase in population of 1000 persons results in an additional harvest demand of 931 animals and 12,188 fish per year.
>
> This per thousand population increase translates to a demand for at least 6,497 wildlife associated days over any one year period. When multiplied by the years that population increase remains in the state, demand becomes significant.
>
> Sportsmen surveys indicate 44 % of this recreation will take place within 50 miles of the individual's residence; 37 % will occur 50 to 100 miles from home; 15 % will occur 100 to 250 miles away; and 4 % will occur over 250 miles from the sportsmen's residence.
>
> Obviously, the recreational impacts associated with this project (Peacekeeper) will place increased demands on a limited resource and will be dispersed throughout the state.

The director also addressed the effects of population on hunting and fishing:

> Total fish supply for the region is estimated to be adequate to meet anticipated demand until 1990, but demand for stream fishing will exceed supply by 1985.
>
> Variation in stream productivity makes it difficult to translate into stream miles, but in this region it could be assumed that most streams would not be capable of providing more than 200 fishing days per year. At this rate, it would require 9.7 miles of additional access for each 1000 increase in population.
>
> The cost of stream easements vary in accordance with productivity but access to streams capable of providing 200 fisherman days per year per mile would cost approximately $15,000 per mile.
>
> Therefore, in order to accommodate the stream fishermen that would be generated by each 1000 increase in population, 9.7 miles of additional access would be required at an estimated cost of $145,000.
>
> Demand for deer and elk hunting within 100 miles of Cheyenne is at or near capacity. As the demand increases, more areas are placed under a limited quota system, which in turn decreases opportunity.

The Wyoming Game and Fish Department's strategic planning objective for deer hunter density in this region is 8 hunters per square mile per season.

For 1000 population increase, it is assumed there will be an increase of 162 hunters and that 81 % or 131 of these will want to hunt within 100 miles of Cheyenne.

Access to an additional 16.4 square miles per 1000 population increase would be required to accommodate the additional demand.

The hunter density for elk hunters in this region is 4.65 hunters per square mile per season.

An additional demand of 134 elk hunters, of which 81 % or 92 will hunt within 100 miles of Cheyenne will require access to approximately 20 square miles of land per 1000 increase in population.

Cost estimates to acquire access for deer and elk hunters are not currently available....Cost could vary considerably and be dependent upon whether one acquired hunting rights to private land or merely acquired access to existing public land....

.....

The Wyoming Wildlife Federation puts considerable weight in the above testimony by Game and Fish Director Don Dexter, as a means to implement good wildlife management and forestall the major disadvantages to sportsmen and sportswomen from excessive population increases. These disadvantages include, but are not limited to:

... quotas on hunting and fishing

... limited access to favorite hunting and fishing spots

... shortened or limited seasons

... competition for dwindling wildlife resources

... decreased bag and harvest limits

... less frequent stocking by Game and Fish Department

... adverse conditions posed by a quick influx of people

... a sharp decline in hunting and fishing quality

... decreased funding for wildlife resources

... dissatisfaction by outdoor enthusiasts, who comprise the largest constituency in Wyoming

.....

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The report continued.

" Congressional officials at the appropriations subcommittee on defense expressed surprise at the magnitude of the future basing." The plan would also add " defensive missiles, or deception with empty silos, or deep basing of additional missiles in the sides of mountains, or a combination of " these ideas.

A continuing flow of MX-related information was conveyed in the Wyoming media. Wyoming Eagle reporter Mike Dean, in Cheyenne, wrote about the Environmental Impact Analysis Process, on January 19, 1983. Quoting Mr. Dean's story:

Even firms the size of URS (Berger) are " awed " at such a " wild project " in terms of " speed and logistics " required in compiling the environmental data, Armando Balloffet said.

Balloffet, who is handling the computer side of the entire effort in Denver, said the contract calls for more environmental work than just the proposed " Peacekeeper " missile basing system.

Sen. John Tower of Texas, a respected expert on missile technology responded to a journalist's question on MX vulnerability, at a Cheyenne news conference by stating:

You would have to have an anti-ballistic missile system (ABM) to make it secure.

The DEIS for Peacekeeper in Minuteman Silos does not address the concept or the impact of an ABM system in its pages. We submit the statement of our own Rep. Dick Cheney of Wyoming to emphasize the need of the final EIS to consider the environmental impacts of defensive or deceptive protection systems. (Casper Star-Tribune, 1982)

We ought to consider modifying the treaty.(ABM treaty with Russia) We could then develop a defensive missile concept at Warren Air Force Base and go ahead and put the MX into Minuteman silos.

CONGRESSMAN SANTINI AND GOVERNOR MATHESON SEEK DECEPTIVE BASING DATA

In fall of 1982, Nevada Rep. James Santini revealed his dissatisfaction with the Air Force handling of MX site and deceptive basing plans. In a letter to a constituent, Congressman Santini said:

I am very concerned about DoD's (Department of Defense) treatment of site selection for the MX. One reason for my distress is that I have written the Air Force twice this summer to inquire about MX siting, environmental studies, and public and local government involvement. To date, I have received no answer....

Another interesting feature of these new (MX) reports is that... the documents immediately launch into a discussion of ways to defend the new system....

Ballistic missile defense is mentioned, as are surreptitious

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A BACKGROUND PERSPECTIVE: FACTORS INFLUENCING THE CONSTRUCTION OF PEACEKEEPER

Before dealing with the specific parts of the DEIS as it affects wildlife, natural resources, and outdoor enthusiasts, it is essential that a background perspective be drawn on those factors now influencing the construction of the Peacekeeper in operation, but which are NOT included as DEIS considerations.

We are referring to the effects of future growth and expansion of the Peacekeeper system, the issue of survivability of the missiles, and of the eventual demand for the resources of Wyoming land and water in large quantities, as strategic requirements to defend the Peacekeeper system emerge.

The Wyoming public is alert to the need for MX survivability, and thus the oversight in meeting the issue head-on in the DEIS is not justifiable.

IS FUTURE GROPER THE KEY TO PEACEKEEPER SITE SELECTION ?

The direction our nation is taking to update our land-based deterrent missile forces had been mandated by the United States Senate almost two years ago. Discussion of placing MX in fixed silos was out of the question - and still is - EXCEPT as an interim step toward the necessary modernization of our ICBM force.

The most unifying and cohesive official commitment to our missile modernization is the Cohen - Nunn amendment to the 1982 Defense Appropriations Bill. The vote for approval was 90 to 4.

It was passed to serve notice on the President that the Senate did not like his interim plan to base the MX missiles in hardened silos in the West. The Cohen-Nunn amendment directed that $334 million of the $35% million intended for research and development of the MX basing system be used to explore the possibility that the missile be put in mobile rather than fixed silos.

It sought to direct President Reagan to keep open the original shellgame basing system. In explaining the vote, Sen. Sam Nunn of Georgia said, " The MX is simply not survivable in existing silos - whether hardened or unhardened. We want any interim basing system to be compatible with mobility, deception, and an anti-missile defense system. " (UPI - Wyoming Eagle - 12-3-81)

Clearly, the Congress was letting the American people know that a bipartisan consensus existed on upgrading our nuclear arsenal and protecting it. Many American people, including members of the Federation, have been responding with an acknowledgement that this is indeed their attitude, as well.

PENDING ENVIRONMENTAL CONSEQUENCE:

THE LINEAGE OF PEACEKEEPER TO DECEPTIVE BASING, AS ABM, & MIDGETMAN

Perhaps no news article has been more widely circulated among groups of Wyoming citizens than the New York Times News Service story from the Casper Star-Tribune of August 19, 1982. In it, Secretary of Defense Caspar Weinberger had " revealed a vast new plan for deploying MX missiles,(beginning) with a $ 25 billion base that would be designed to take on additions until the end of the century. "

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movements of MX between the closely spaced basing and deep basing locations. In other words, deceptive basing and mobility are still key components of the MX picture.

But to my knowledge, no one is studying the impacts of these additional features on the surrounding land....

Also distressed with the turn of MX events affecting the environment was Utah Governor Scott Matheson, who wrote a letter of stern reproach to Air Force Secretary Verne Orr in October, 1982. Governor Matheson said:

Dear Mr. Secretary: I am writing to you and Secretary Weinberger of the Department of Defense to get answers to questions that I have raised with the Air Force, that have not been adequately answered to date.

I have also recently learned that Congressman Santini has also raised similar issues to the same end....

I wrote to Brig. Gen. Causey, USAF, Commander of the Ballistic Missile Office,... asking to be briefed on the ... deep underground proposal (and) (1) the criteria to be used in the survey, evaluation, and selection process; (2) the composition of the data base .... and (3) the manner or method to be used to apply the criteria and data.

In July I received a letter from Gen. Causey declining to brief me (which was informally reiterated in September).

The Air Force has steadfastly continued to either: (1) maintain that they are not at liberty to answer my basic, simple questions (although it has been privately conceded that they know many of the answers), or (2) has provided contradictory or mutually exclusive responses....

Governor Matheson concluded his letter by saying:

To date, the activities and processes associated with the MX weapon system have been veiled in secrecy, and for no really apparent reason or purpose. I am extremely dissatisfied with what I perceive as a deliberate campaign to obfuscate my attempts to learn what is occurring....

What was occurring was an eventually successful effort, unveiled by the Roncrorft Commission, to commit the Congress of the United States to the highly mobile, manpower and resource intensive " Midgetman " program.

The New York Times News Service reported in the Wyoming Eagle on June 28, 1983 that the Senate Armed Services Committee " voted $604 million to begin research on the smaller ICBM - Midgetman, " recommended by the Roncroft Commission.

PEACEKEEPER AND MIDGETMAN: THE LINKAGE IS FORMALIZED

The Times article announced the integral linkage of MX with Midgetman, as it stated:

> The Commission recommended, and President Reagan approved, deploying 100 MX missiles... in existing silos (Minuteman) but moving on to develop a missile with a single warhead that could be transported with enough speed to evade an enemy attack.

The Wyoming Wildlife Federation feels that such publicly released proclamations, routinely handled at regular intervals in the Wyoming media, have imparted on the citizens of Wyoming an accurate expectation level of project escalation and linkage. We feel that such expectations, given by responsible journalists and national leaders, are based on reality and correctness. The DEIS should include, but does not, an assessment of environmental impacts of additional systems which will protect and complement Peacekeeper. It is our hope that the final EIS WILL address these impacts.

We realize a security drawback can exist if classified data on countermeasures such as ABM are not carefully monitored. And it must be underscored that the Federation is not passing judgement, in any way, on the pros and cons of the suggested systems.

35 Rather, the WWF objects only to the DEIS, where, by its omission of deceptive and defensive systems in impact considerations, it is thus eliminating Wyoming's capability to adequately prepare for the greater population and resource requirements destined to be brought on by follow-up programs to Peacekeeper.

MITIGATION, DELAYS, & SOME REASONS WHY

In order to mitigate the types of boom conditions expected, huge sums of mitigation moneys will be needed. But history reminds us that impact monies get appropriated and spent only AFTER the problems have been created. By that time, many worthy interests are already standing in line, competing for the same, limited available monies.

89 The faster Wyoming grows, the farther down the list of priorities the wildlife resource will slide. Unless swift and adequate mitigation measures are approved, the slide could overwhelm the resource.

Mitigation and bureaucratic delays usually go hand in hand. Right now, delays of serious proportions confront planners in Cheyenne and throughout Wyoming. The remarks of the bureaucrats cast a pall over the dispositions of citizens, who are used to business-like efficiency and direct action.

A. Marcos Ortis reported the following bureaucratic roadblocks, in the September 30, 1983 edition of the Casper Star-Tribune:

> Charles Ellington, western director of the U.S. Office of Economic Adjustment stated that documentation of impacts would be needed before Congress would even consider releasing " front " money.
>
> Ellington said, " There is a lot of work to be done before any mitigation monies flow. That's because we haven't identified or quantified (an impact). It's hard to identify which federal agency is going to work on an impact that has not been identified. "
>
> Ortis writes: The apparent delay in funding has soured Wyoming officials who have presented preliminary estimates of more than $ 50 million....
>
> Mick Scapp, aide to Cheyenne Mayor Don Erickson said, " The timing for the money is crucial .... If, in fact, there is no immediate money to deal with our water problems, we need to know that now so we can take a different approach.
>
> Scapp said the combined city-county estimate for water and sewer projects would be $ 34.8 million for first year mitigation. " But that's the price you pay for placing it (MX) in the middle of a desert, " Scapp continued.
>
> Ellington said, " That's not even in the realm of possibility, not without documentation.(He was referring to Scapp's request.)

89 Ortis further writes that an Air Force spokesman said there is no guarantee Congress will approve additional funds beyond $800,000, (the amount) to be shared by Wyoming and Nebraska for impact studies.

> " The expenditure of the money is subject to microscopic scrutiny by the public and Congress, " said Lt. Col. Tom Holycross. " There is no guarantee the remaining ($1.2 million) will be appropriated, " he said.

Major Peter Walsh, Director of Environmental Planning for Peacekeeper, said in July, 1983, as quoted in the Casper Star-Tribune:

> Compiling data is very difficult. " It's like a moving train; a number good today is no longer good the next day. "

These bleak, very recent, but very real revelations on obstacles to effective MX mitigation will definitely touch the lives of outdoor enthusiasts if the normal course of events is meekly accepted. The " formula " arising from the above remarks is almost reminiscent of a Catch- 22.

1. By underfunding impact studies, officials are assured of receiving little or insufficient data.
2. If there is no documentation of impact data, then little or no mitigation monies will be approved.

3. Even if NO impact monies flow from the normal mitigation sources (Congress, federal agencies, Air Force), the impact problems STILL REMAIN TO BE FINANCED.
4. The PEOPLE of the State of Wyoming and the PEOPLE of the City of Cheyenne will assume the called-for indebtedness, and this " source of last resort " will underwrite a disproportionate part of the full impact burden.

If the citizen-sportsperson and outdoor enthusiast have to pay accelerated tax levies, to raise the revenues for Peacekeeper mitigation, then less money will remain in resident's pockets for wildlife-related and outdoor-oriented activities.

The result would become a net loss for Wyoming's second leading source of income; the $ 100,000,000 per year tourism and outdoor recreation industry.

89 Money that might have gone to buy gas, stay in a motel, purchase a meal, hire an outfitter, or buy a new fishing rod will, instead, go toward the payment of taxes - unnecessary taxes because an unfeeling bureaucracy was aired in red tape and could not respond in time. And Mr. Ellington's words will serve as a reminder: " There is a lot of work to be done before any mitigation monies would flow. "

Members of the Wyoming media have continued to probe for information. Kirk Knox of the Wyoming State Tribune asked Mayor Don Erickson, in October, 1983, what the mayor expected to do in case the federal impact monies he said would be sought were not forthcoming. " I guess we will have to cross that bridge when we come to it, " the mayor responded. The mayor later said that some alternatives were being considered by his Impact Team, in case federal impact monies were not available in needed depth, or at a time considerably later than the beginning of substantial impact.

The material included in the section entitled " A PROFESSIONAL YARDSTICK " has also been turned over to the mayor's Impact Team. According to Wyoming Game and Fish Department Director Don Dexter, the report was turned in to the chairman of the City's Recreation Subcommittee on September 1, 1983. On the frontispiece of the director's memorandum, he commented, " I'm not certain at this time just how the material will be incorporated into the City's impact analysis or whether the City will seek mitigation outside the town. I suppose this will be up to the mayor. "

On behalf of the outdoor enthusiasts of Wyoming, the Federation requests that the Air Force expeditiously clear the logjam to Peacekeeper mitigation monies.

WHAT WE KNOW ABOUT MIDGETMAN'S POTENTIAL IMPACT TO THE ENVIRONMENT

According to Lance Gay, Scripps-Howard reporter, the Air Force told Congress in May, 1983, that the single warhead Midgetman missile will cost at least $100 billion - 5 times as much as Peacekeeper.

To quote Gay:

> The Air Force says the Midgetman would require its own heavy duty roads, making its deployment scheme similar to the " racetrack " idea advocated by the Carter administration....
>
> Congressional aides noted that each missile, together with its transporter, would be so heavy they would crumble normal roads and break down bridges.... unless they travel over the special heavy-duty military reservation road system envisioned.
>
> The plan envisions assigning 50,000 people to maintain and guard the 1000 missiles 24 hours a day.

FROM THE SPORTSMEN'S POCKET

For the sportsman, access to hunting, fishing, and trapping lands would be severely curtailed if thousands of acres of Wyoming territory are turned over to Midgetman. A Denver newspaper mentioned a 12,500 square mile area in a preliminary story on the new mobile missile.

If these projections are true, then phenomenal acquisitions of land and water would be required. Without planning today, in the final EIS, the State of Wyoming could cease to exist in its traditional form.

For outdoor recreation to continue to thrive, residents must be able to retain much of their present purchasing power. However, a shift is underway to transfer to the residential taxpayer a larger share of the state's property tax burden.

88 Under the initial directive, since rescinded through the political clout of residents, the change would have caused a shift away from industry and to the homeowner. The original change would have raised average home assessment by about 47 %, according to Malcolm Venolia of the Casper Star-Tribune.

Such tax shifts could easily undermine the economic strength of wildlife-related activities in Wyoming, by diminishing citizens' pocket dollars. One Cheyenne resident, at a public forum, suggested that if mitigation funds are not sufficient, then a broadened revenue base is long overdue.

Wyoming people are by nature a conservative lot. We expect a return for our tax dollars and the use of cost-efficient criteria when government spends them. Our state leadership has been outstanding over the years in this regard.

We do not believe that waste of the public treasury is inevitable. We are uneasy when horror stories of bureaucratic mismanagement come our way.

11-19-83

88 For example, US News and World Report ran a small piece on waste of tax dollars in its November 14 issue last week. The magazine informs us that one department of government spent $ 9,600 for a 12 ¢ wrench.

This breaks down into a new deal for wildlife, because research programs, acquisitions, and professional management will not be funded, to the extent of the wasted $ 9,599.88. This is potential mitigation money being lost through flagrant and careless neglect.

To do it properly, the WWF recommends stringent cost-effective monitoring by our Air Force, to free up mitigation dollars for critical need in Wyoming.

AGRICULTURE, RANGELAND, FARMLAND, AND WATER

230 It is the conclusion of the Federation that the real 10 year growth prospect is not yet incorporated in this DEIS, but it is as certain as surprise to the Congress and your own Air Force planners.

According to Johnson County rancher Mark Gordon, the expanding system will pit the military in direct competition with ranchers and farmers for reliable water sources.

" The health and vitality of the rangeland and the agricultural community will be at stake. Couple MX construction demands with expanded energy activity in the Powder River Basin and the Overthrust Belt and the squeeze on water and rangeland for stock growers and farmers may be overwhelming. The MX represents an additional water consumer in an already over-appropriated area of the state, " Gordon said.

The WWF concurs. When water is made available for Peacekeeper and its accompanying systems, water-intensive industries will be attracted to southeast Wyoming, placing still further demands on the recreational resource. Synthetic fuel and coal liquefaction operations can be expected to cast an eye toward the 157,000 acre feet of water in the Little Snake Valley, which the City of Cheyenne owns the annual rights to.

THREATENED AND ENDANGERED SPECIES: WILDLIFE AND PLANTLIFE

1441 While the Federation acknowledges that the project will have significant long-term impacts on endangered wildlife and plant species in the area, we do believe that specific identification and mitigation does exist which can lead to acceptable accommodations.

ADDRESSING THE ISSUE OF RECREATION

1171 The environmental consequences, mitigation measures, and unavoidable impacts
1172 to the recreational resource set forth in Section 3.1.11 are thoroughly understated, insufficient, and Proposed Action, Section 3.1.11.4.1.2 is inadequate; it does not seek to address an already overloaded resource.

11-19-83

The DEIS conclusion that " long-term impacts are generally low and not significant " (Page 3-190) has excluded from the baseline data all of the recreation on growth of the system, of the type submitted in this commentary, although each fact here enclosed has appeared in the various Wyoming media.

35 DEIS estimates of impacts to hunting and fishing in Medicine Bow National Forest, and fishing at Lake Hattie, Twin Buttes Reservoir, Sprigner Wildlife Unit, Wheatland Reservoir #3, and Rhoebar Lake are profoundly understated, showing no allowance for expansion of the Peacekeeper system, as demanded by Congress.

In a story featured in the Wyoming Eagle, reporter Lynn Sturtevant explained that Curt Gowdy State Park, Sloans Lake, and Medicine Bow areas are expected to have additional recreational use due to an increased number of people brought in by the MX.

> Toni Curtis, Land Use Resource Manager for URS- Bergen consultants, said the increased use will not be detrimental. Hunting will feel the most impact in Medicine Bow, said Curtis, but it will not be in excess of what the capacity is.
>
> The greatest increased pressure at the state parks was expected to be fishing, hiking, boating, picnicking and camping, he said.
>
> Jon Bonds, planning section head with the Wyoming Recreation Commission disagreed with Curtis on the impact of the recreation areas and extra personnel needed... Bonds said they would need extra personnel.
>
> " Somewhere we're going to have to get additional funding, whether it's from the state or the Air Force, to deal with increased demands, " Bonds said.
>
> Bonds also disagreed with the URS- Bergen study on the impact the MX will have on Curt Gowdy State Park. " They said there will be a very minimal impact to the park and we disagreed with that. We feel that the park right now is heavily used, and additional use is going to be too much to take. "
>
> Bonds is also quite concerned that people attracted by MX jobs will use the park as a place to live.

226 The WWF agrees with Mr. Bonds. URS- Bergen and the DEIS have eliminated consideration of accurate projections on the number of MX job seekers and their impacts by refusing to include manpower consequences to be brought about by the support systems mandated to protect Peacekeeper.

11-19-83

THE LESSON OF THE JIM BRIDGER POWER PLANT

A few miles east of Rock Springs, Wyoming lies the Jim Bridger Power Plant. The experience of its personnel department in securing construction workers provides a forceful lesson on the nature of the workers interest, dependability, and numbers. (September, 1976 issue of Whole Country)

Planners estimated that 620 workers would build the plant, and, like the Air Force, they were confident of statistical accuracy. What happened to that estimate during the course of the project has also occurred in towns such as Craig and Rifle, Colorado. The figure was far too low and the communities were not prepared for the influx of the actual workforce, which in the case of Jim Bridger peaked at 3,200 workers in 1973.

Many of the same workers move from project to project. As one is completed, they hire-on at a fresh one starting up. The Bridger example is not an isolated one. The skill level of the power plant workers is specialized, for the most part, as will be the Peacekeeper personnel.

Why was the workforce almost 5½ times the original appraisal ? There was a tremendous and ongoing loss of productivity due to worker turnover, with the remaining of new faces taking its toll in quality, time, and overall costs. The workers themselves were leaving in droves, which is not unusual considering their lack of roots in the community.

424 The WWF requests that the Air Force recognize and utilize the lessons learned in boom projects, by consulting with experts who have worked first-hand and can provide keen insight into planning and mitigation procedures. The University of Wyoming and the Wyoming Industrial Siting Council are vast resources of expertise and assistance.

TRANSITION IN THE WYOMING ENVIRONMENT

498 Is the problem of a large influx of job seekers and dream seekers really a totally manageable one, as the DEIS suggests? Or could the pot of gold syndrome spread like prairie fire through the urban cities of the unemployed ? Could just one cast member of a television fiction series, such as the Denver-based " Dynasty " be capable of stirring the imagination of tens of thousands by merely uttering in the midst of an episode, " I hear Cousin Haggarty is looking for a job in Cheyenne with the MX. "

Representative Matilda Hansen of Laramie, Wyoming has stated in 1981 that with federal budget cuts in unemployment and welfare benefits, and a shifting of these responsibilities to the states, " People out of work in the East will perceive Wyoming is a good place to be... with an abundance of work to be had. We'll see skilled people come into the state and that will put a damin on our welfare system, because we won't have energy jobs for everybody who comes in. We could even see brand lines as a result. "

She said " fallout " from the (budget) cuts and subsequent mass immigration could lead to " ghettos " in Wyoming and a crime rate " you wouldn't believe.... We are going to have impact from the problem of other states like Ohio and Michigan are having. How do we cope with that ? "

11-19-83

On its own, through the foresight of responsible and caring state and local political leadership, Wyoming has been trying to cope with urban sprawl. In an Associated Press clipping, Gillette City Administrator Flip McConnaughey said, " I think it's happening anywhere you have rapid growth, and where there hasn't been a strong policy of planning and trying to guide that growth. "

According to a Wyoming Eagle report by DiAnn Conyers in June, 1983:

> A smaller percentage of Wyoming residents receive welfare assistance than in any of the other 49 states, but that may change if the MX missile is deployed near Cheyenne.
>
> Ralph Mc Connaby of the division of social services of Laramie County said, " Many people will come ill-prepared to cope with the situation here. "

Writes Conyers:

> Many of those expected to come to Cheyenne will be unskilled. Many will not be able to get security clearances.... Many will use their last bit of money to get to Cheyenne.
>
> Mc Connaby said, " It's the state government ** that has to realize what's coming and provide us the funds and resources to deal with it, and so far no provisions have been made that I know of.... Our needs exceed our supply, so the MX impact will really squeeze us. "

92 ** The WWF does not agree that state government, or local government, should incur a disproportionate percentage of the financial obligations of a national project which is national in benefit and national in scope.

Panther Wynne Todd of Cheyenne, speaking for the CONBA shelter in fall, 1983 said, " Our biggest concern is the MX impact - there may be a 1000 % increase in the need for our services. "

WHITE BUREAUCRACY FLOES, FREE ENTERPRISE ACTS

While bureaucrats are moving at slow paces of preparation for the Peacekeeper influx, developers in private enterprise seem to know what is going on in the marketplace and are responding with action, in the Cheyenne area, Fort Collins, and elsewhere.

It is said to assume that business leaders are aware of the necessity to defend Peacekeeper, and when the inevitable is put into gear, they will be ready. Contingency plans and alternate courses of action are not last-minute affairs in the areas of efficiency that is American free enterprise.

In a Rocky Mountain News article in October, 1982, Jim Hanchett of the paper's Northern Bureau wrote a piece entitled, " Fort Collins Ripe For Development. " No MX connection is made or even hinted at by Hanchett, but the following statement from his investigation could provide a clue:

> Although five projects are in the works, local businesses and hotel industry experts contend there is room in Fort Collins for only one or two.

Indeed, farsighted venture capitalism was at work, and will be prepared when Peacekeeper principals require rooms in Fort Collins.

TRANSIENTS IN THE FIELDS ?

The Wyoming Wildlife Federation feels, without reservation, that the problems presented by transients entering the Cheyenne area, and affecting the " people pressure projections " for wildlife and natural resources, will be far greater than the DEIS acknowledges.

499 The Federation is concerned that masses of transients realising the potential of the Peacekeeper system, will come to unprepared Wyoming without adequate personal belongings and finances to provide for their sleeping and eating requirements.

Particularly vulnerable would be the herds of nearby antelope to off-season poaching. As well, the livestock of area ranchers would be susceptible to rustling, with arroyos, basins, and low places between ridges of rangeland and farmland serving as possible shelter from wind and concealment from view.

Walking transients, whose next house could be carried in their knapsacks, could be expected to move frequently, from place to place, in search of food.

To the outdoor enthusiasts of Wyoming, the welcome signs on area properties could quickly be painted " keep out. " The result of negligent transients trespassing on private lands could be the closure of access to hunters, fishermen, trappers, wildlife photographers, hikers, and others.

1158 Over the years, ranchers and farmers have done a fantastic job providing for hunters and fishermen, wildlife and habitat. But a surge of uncaring humanity could quickly compromise the years of workable relationships between outdoor enthusiasts and the backbone of Wyoming wildlife: the ranchers and farmers of Wyoming's agricultural community.

This unacceptable possibility should not be ignored by the United States Air Force, in the final EIS on the Peacekeeper proposal.

TRANSIENTS IN THE CITIES

535 A widely respected professional, Cheyenne Police Chief Byron Rookstool, has told the Air Force at an EIS scoping hearing that he will need more manpower if Peacekeeper comes to southeast Wyoming. In a UPI story, the chief said unique law enforcement problems face Cheyenne:

> " My point is that they're bringing this unique thing in here which is liable to cause demands of major proportions in this community, and they're telling me I'm only going to need 15 people in 9 years. Well... that's bullcrap. That's all there is to it. "

535 The chief said local law enforcement would be dealt a serious blow in 1984, if Air Force officials rely solely on data collected earlier this year for their current MX EIS.

The Federation agrees with Chief Rookstool. Citizens, outdoor enthusiasts among them, deserve the same first-rate quality police protection that has been rendered in the past.

THE CONCERNS OF AGRICULTURE ARE IMPORTANT TO US ALL

The Federation is steadfastly concerned with the needs and requirements of Wyoming's agricultural community, which has served the wildlife resource with unsurpassed stewardship.

The WWF feels the following remarks, carried in the state's media, should be a part of the Air Force's EIS considerations.

From the Casper Star-Tribune, October 27, 1982:

Tharon Anderson, President of Evergreen Farms,Inc., of Albin, Wyoming said:

> " The MX is not " Minuteman. " It has the potential to become the largest military enclosure anywhere. The eventual size and requirements of MX are a disturbing concern to us in the agricultural community.
>
> 1143 Land and topsoil are disappearing from ranching and farming use at an alarming rate.... "

From the Casper Star-Tribune, October 14, 1982:

Reporter Philip White wrote:

> ... 37 eastern Laramie County landowners... signed a letter Monday protesting a permit granted by the (Laramie) county commissioners to Earth Technologies to drill test holes along county roads... to gather information on soils, rock and groundwater... on potential sites...for the...MX missiles.
>
> In the letter, the landowners allege the commissioners had no legal authority to allow the drilling along the county road rights of way.... The letter asked that the commissioners withdraw the permit.... The commissioners amended the permit to require... permission from... landowners before drilling.

From the Wyoming Eagle, Cheyenne, October 13, 1982:

Reporter Mike Dean Title: County Landowners Fight MX Test Drilling

> 1443 The MX is " a sore spot out here, " Mrs. Leonard Anderson said....
>
> She said geologists were conducting seismographic tests in a ditch yesterday and " they drove over our wheat to get to the ditch. It is one of the best agricultural areas in the state. "

The Federation believes that the Wyoming Industrial Siting Council should provide whatever data possible to the Air Force, so that mitigation and impact assistance to ranchers and farmers, and agricultural resources, are swiftly implemented.

The WISC will be particularly useful, to further the data base, as deceptive basing and Midgetman are added to the Peacekeeper system.

.....

THE CONCLUSION OF THE WYOMING WILDLIFE FEDERATION COMMENTARY ON THE DEIS FOR PEACEKEEPER IN MINUTEMAN SILOS

The Wyoming Wildlife Federation is proud of its role in furthering the conservation ethic in Wyoming. With our efforts to provide data and human assistance, so that a project may be constructed right and properly, the first time, we seek to be good stewards of our wildlife and natural resources.

We believe the Federation has attempted to promote the wise consumptive use of our outdoor environment. In addition, our membership shares a profound sensitivity to the needs of non-game wildlife, and non-consumptive uses of the great recreational resource storehouse that is Wyoming.

We are gratified to learn of a statement by Congressman John Seiberling of Ohio, chairman of the House Public Lands Subcommittee, who said, on November 18, 1983:

> The environmental groups in Wyoming " have a great influence " among House members.

In the previous pages, the WWF has sought, in a spirit of goodwill, to impart a measure of guidance to the United States Air Force in its immense task of mitigating the Peacekeeper proposal.

We are concerned about wildlife's future in a bigger Wyoming because there is no place else like Wyoming. We try to be objectively vigilant because hunting and fishing do not exist in a vacuum. Elk in the forest and trout in the stream do not appear simply by magic.

It takes outstanding management of wildlife resources by professionals who care. It takes broad cooperation and partnership with our agricultural, political and military leaders. And it takes the solid support of the largest constituency in Wyoming - of which we are part - the huge constituency of the outdoor enthusiast.

We care, too, about the defense capabilities of our nation. Patriotism and devotion to our nation's interests are deeply ingrained in the Wyoming citizens' way of life.

Thus, it is through logic and reason that we urge our Air Force to include the total " big picture " in its final EIS mitigation proposals for Wyoming, and our bordering states.

It is common sense and common knowledge that Peacekeeper must be, and IS to be made survivable. The only environmental source which has NOT recognized this fact, and incorporated its meaning into its contingent possibilities, is the DEIS in this very discussion.

The Federation recognizes that this DEIS is not a normal EIS. In fact, it is a departure from traditional EIS's, as mandated by the National Environmental Protection Act. The DEIS for Peacekeeper is an EIS without any alternative.

Because Peacekeeper has the potential to grow bigger, and expand as our nation requires it, the Peacekeeper project is the largest single concern of conservation groups such as ours.

Mitigation cannot wait.

Therefore, it is the specific recommendation of the Federation that waivers be granted on public laws addressing mitigation and impact to states and communities, so that monies are not withheld and appropriated only after the impact problems occur.

89 The waiver procedure would allow that funds be extended ahead of time, before the impacts set in. The waiver, if granted, would be a monument to foresight and smart planning.

The Federation asks that an early funding principle be applied to the requests for wildlife and recreational resource mitigation, since these impacted resources are so intimately woven into the traditions and heritage of the State of Wyoming.

94 The Federation also asks that, because of the eventual size of the project, requests for mitigation be broadened, after deliberate research and verification of needs, to include all categories of potential environmental impacts addressed in the DEIS: employment demand; housing; public finance; construction resources; social well-being; public services and facilities; utilities; energy resources; transportation; land use; recreation; cultural resources; visual resources, water resources; biological resources; geologic resources; threatened and endangered species; noise; and air quality.

465 The boom and bust cycle is a matter of concern. Dr. Tom Dougerty of Cheyenne, a specialist in psychological impacts of boom towns, said a substantial increase in alcohol use can be expected in Cheyenne when MX construction workers begin to file into the city. He said that 48 % of the workers on the Wheatland power plant admitted they were alcoholics. Dougerty added that statistics indicate 70 % of all violent crimes, and 68 % of all murders can be attributed to alcohol. (Reported by S.M. Getzug, Wyoming Eagle, June 29,1983)

Due to the desire of Congress and the American people, that Peacekeeper be survivable, and due to the Scowcroft Commission's recommendations linking a Midgetman program as a follow-up to Peacekeeper, the Federation feels that a " bust " cycle may be avoided by early Department of Defense integration of the Peacekeeper project with its ensuing backup. The consensus for making the Peacekeeper survivable is a political reality that needs to be incorporated in the DEIS.

For reasons of national security, it may be necessary to classify such data as is gathered by D of D planners. Nevertheless, studies and preparations for adequate impact mitigations for each succeeding program should begin now, and be ongoing to reflect upgrades and changes in the systems.

The Peacekeeper program has the undisputed potential to change not only the landscape of our area, but the attitudes and values of many residents, as well.

It should be remembered by all who have the power to " do it right, " that if the West is despoiled, then so is the spirit of men, women, and youngsters across America who covet its spacious refuge in weeks of their leisure.

Wyomingites have always been right in the center of the state's decision making processes that have nurtured the western way of life. In Wyoming, the democratic process works. In the months and years ahead, though, residents could feel short-changed, by watching events unfold in a manner opposite to the way in which they were advised.

Retaining the confidence of the Wyoming people should be a foremost priority, so that the transition period in strategic missile modernization is consistent with Wyoming's values and Wyoming's past.

If mitigation monies and procedures are botched, in bumbling bureaucratic fashion, Wyoming citizens will no doubt allocate blame. If impacts are ignored; if mitigation and funding are insufficient or needlessly minimized, and Wyoming is left to flounder amidst higher taxes because of the project, then the fabric of citizen support for similar undertakings could erode.

Unlike other states where lip service is paid to " quality of life, " here in Wyoming quality of life is important. It runs deep, and it is heartfelt.

It is grounded in our values: patriotism, family, friendship, honor, trust, character, integrity, hard work, free enterprise, agriculture, wildlife, dependency on the land, and sound stewardship of natural resources.

Destroy these values and the foundation of community support will wear away.

Do it properly and do it right the first time; the support and gratitude of the community will be constant and resolute. That is why Warren Air Force Base is held in high regard today, as are the people of the service who have worked to make it what it is.

In the final compilation of the EIS, there are choices.

Do we choose to consult with those most familiar with the problems ?

Do we choose to identify the problems ?

Do we choose to seek mitigation ?

Do we choose to submit the applications to seek mitigation ?

Do we choose to share the costs of a necessary national project with our fellow taxpayers in 49 other states, or Do we choose to " let Wyoming go it alone ? "

Do we really choose to do it right, the first time ?

The answers to the questions, " Do we choose to ... ? " rest squarely with the Congress, the federal agencies, the Air Force, and public officials in Washington and Cheyenne, who are charged to represent the best interests of the United States of America and the people of Wyoming.

The cooperation and assistance of the Wyoming Wildlife Federation, to define, identify, and seek solutions to the challenges presented to this great country are enthusiastically offered.

The Federation, on behalf of the outdoor enthusiasts of Wyoming, is grateful to the United States Air Force for this opportunity to suggest ways to make the Final Environmental Impact Statement a document which endeavors to " do it right, " with mitigation monies coming from the full 50 states, and not Wyoming alone.

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September 1, 1983

MEMORANDUM

To: Pete Petera, Assistant Director

From: Don Baxter, Director

Copies: Bruce Hacker, Game Division, Fish Division

Subject: MX Impact Analysis and Mitigation Proposal

I expanded the MX Impact Analysis to include some potential mitigation proposals. A copy of the expanded report is attached for your files.

The report was turned in to the Chairman of City's Recreation Subcommittee of the MX Impact Team this morning. I'm not certain at this time just how the material will be incorporated into the City's impact analysis or whether the City will seek mitigation outside the town. I suppose this will be up to the Mayor.

attachment

DD:ag

WYOMING GAME AND FISH DEPARTMENT
August 25, 1983

Demands for wildlife associated recreation resulting from human population increases precipitated by the MX Missile Project could be extensive. Based upon the percentage of the population that uses the various wildlife resources, each increase in population of 1000 persons results in an additional harvest demand of 931 animals and 12,188 fish per year (see attached listed tables). This per thousand population increase translates to a demand for at least 6,497 wildlife associated days over any one year period. When multiplied by the years that population increase remains in the state, demands become significant.

The impact will be felt throughout the entire state. Sportsmen surveys indicate 44% of this recreation will take place within 50 miles of the individual's residence; 37% will occur 50-100 miles from home; 15% will occur 100-250 miles away; and 4% will occur over 250 miles from the sportsman's residence (Fig.1).

Obviously, the recreational impacts associated with this project will place increased demands on a limited resource and will be dispersed throughout the state.

The percentage of resident population that purchased a license in the following categories during 1982 is listed below:

Fishing	25.0%
Deer	16.2%
Elk	11.4%
Antelope	5.8%
Bird	6.2%
Small Game	3.2%

(This percentage is calculated on season licenses for adults. No additional or youth licenses are included. The 1982 population estimate of 507,451 was utilized)

Objectives for harvest and recreation rates for these license holders are as follows:

License	Success	Rec. Days
Fish	2.3 fish/day	19.5 yr.
Deer	50%	5.7 per deer
Elk	24%	18.0 per elk
Antelope	89%	2.4 per antelope
1/Bird	1.2 bird/day	6.2 yr.
Sm. Game (cottontail)	2.1 rab./day	6.8 yr.

1/(includes pheasant, partridge, grouse, ducks, geese & doves)

These data are then utilized to determine the anticipated license, harvest and recreation day requirements per thousand persons.

For M

License	No.	Harvest	Rec. Days
Fish	250	12,188	4875
Deer	162	81	462
Elk	114	28	504
Antelope	58	52	125
Bird	62	461	384
Small Game	32	309	147
Total	678	13,119	6497

These recreation days will be disbursed throughout the state. Based upon the distances that hunters and fishermen in the southeast portion of the state indicate that they travel to recreate, the following disbursal can be anticipated:

Distance (mi)	Rec. Days	Percent
<50	2820	44%
50-100	2423	37%
100-250	939	14%
>250	315	5%
Total	6497	100%

Total fishing supply for the region is estimated to be adequate to meet anticipated demand until 1990 but demand for stream fishing will exceed supply by 1985. Over 81% of the stream fishing supply is on private lands where access is either limited or not permitted. Additional supply could be provided by acquiring access to select stream ranches in the area. The increased demand for all fishing is estimated to be 4,875 fishermen days per year per thousand populations.

Game and fish Department surveys indicate that about 50% or approximately 2,400 days of this increased demand will be for stream fishing where demand will exceed supply by 1985. Assuming that 81% of 2,400 fishermen days will be expended within 100 miles of Cheyenne means that additional access to accommodate 1,944 stream fishermen days will be required.

Variation in stream productivity makes it difficult to translate demand to stream miles, but in this region it could be assumed that most streams would not be capable of providing more than 200 fishermen days per year. At this rate it would require 9.7 miles of additional stream access for each 1,000 increase in the population.

The cost of stream easements vary in accordance with productivity but access to streams capable of providing 200 fishermen days per year per mile would cost approximately $15,000 per mile. Therefore, in order to accommodate the stream fishermen that would be generated by each 1,000 increase in the population, 9.7 miles of additional access would be required at an estimated cost of $145,500.

Demand for deer and elk hunting within 100 miles of Cheyenne is currently at or near capacity. As the demand increases, more areas are placed under a limited quota system which in turn decreases opportunity. It would be possible to provide for some increase in deer and elk hunting opportunity by obtaining access to lands not now available to hunters.

The Wyoming Game and Fish Department's strategic planning objective for deer hunter density in this region is eight hunters per square mile per season. For each one thousand population increase, it is assumed there will be an increase of 162 hunters and that 81% or 131 of these will want to hunt within 100 miles of Cheyenne. Access to an additional 16.4 square miles per thousand population increase would be

required to accommodate the additional demand.

The hunter density objective for elk in this region is 4.65 hunters per square mile per season. An additional demand of 114 elk hunters of which 812 or 92 will hunt within 100 miles of Cheyenne will require access to approximately twenty square miles of land per thousand increase in population.

Cost estimates to acquire access for deer and elk hunters are not currently available. In any event, cost could vary considerably and be dependent upon whether one acquired hunting rights to private land or merely acquired access to existing public land.

The supply for antelope, bird and small game is now in excess of demand so mitigation/impact on these species would not be required at this time.

WYOMING WILDLIFE FEDERATION

ADDRESS REPLY TO:

WWF-2E12
11-19-83

Tom Dougherty
6635 Bonar Drive
Cheyenne, Wyoming 82009
April 12th, 1983

Immediate Past President, WWF
National Wildlife Federation
Representative for Wyoming

President Ronald Reagan
The White House
1600 Pennsylvania Avenue
Washington, DC

Dear Mr. President,

The Wyoming Wildlife Federation resolution on the deployment of MX missiles in Wyoming begins as follows: " Whereas, we, the members of the Wyoming Wildlife Federation, recognize and support our nation's commitment to strength through preparedness,...."

The entire rationale of the Federation on this issue is here enclosed for your consideration. The resolution spells out how we see ourselves helping during the period of impact. We feel its contents may be helpful to you in your ongoing assessment of Wyoming citizen attitudes toward both the MX AND responsible stewardship of our unique Wyoming environment.

The March edition of the " Pronghorn," the official publication of the Federation, is also enclosed to underscore many of our conservative western values which we share with you. In its pages are a number of important political requirements that you should know about, because they are necessary, they affect our proud Wyoming heritage, and they enjoy broadly based public support. In light of the missile project, two of them - the Wildlife Trust Fund and In-Stream Flow proposals - are absolutely essential to wise husbandry of our natural resources.

At this time, we extend our full cooperation and assistance, to help identify and address all areas of environmental consequence, so that MX mitigation is adequate and construction proceeds in an environmentally sound manner the first time.

The Wyoming Wildlife Federation is the oldest and largest association of sportsmen and affiliated outdoor clubs in the State. Our executive committee and board of directors are made up of representatives of Wyoming's business, conservation, industrial, agricultural, and professional communities. It is our sincere conviction that economic development AND natural resource stewardship can go hand in hand, and that friendly consultation and fair compromise is the proper approach to solid achievement.

Mr. President, in a poll taken of Federation leaders and members in 1980, you held a 2 to 1 advantage over former President Carter.

With warm regards,

Tom Dougherty

Wyoming Outdoor Sportsmen dedicated to Wildlife Conservation and Preservation.

April, 1983

Wyoming Wildlife Federation

RESOLUTION

The Role of the Federation in the Planning Process
For Missile System Impact

WHEREAS, we, the members of the Wyoming Wildlife Federation, recognize and support our nation's commitment to strength through preparedness; and

WHEREAS, we, the members of the Board of Directors of the Wyoming Wildlife Federation, find the placement in Wyoming of the MX missile system and any additional systems required to defend it, to be a great potential consequence to our wildlife, our precious water supplies and natural resources, our rangelands, our farmlands, our agricultural economy, our traditional economic and recreational pursuits, and our western way of life; and

WHEREAS, the eventual size of the system is not at this time known; and

WHEREAS, we realize that some considerable degree of environmental impact may be expected regarding usage of Wyoming water and Wyoming land; and

WHEREAS, wildlife habitat could be diminished; and

WHEREAS, a rapidly increasing Wyoming population may severely strain the capacities of wildlife agencies, wildlife managers, and wildlife management policies causing possible changes such as licensing quotas, license fee hikes, shortened hunting and/or fishing seasons, restricted bag and harvest limits, and other considerations; and

WHEREAS, the Wyoming Wildlife Federation recognizes and acknowledges with appreciation the outstanding and irreplaceable husbandry of state and federal agencies and the Wyoming agricultural community, on behalf of our state's wildlife and natural resources; and

WHEREAS, the Wyoming Wildlife Federation recognizes and acknowledges that the Wyoming Agricultural Community is vital to our state's wildlife, sportsman, and economy; and

WHEREAS, the proposed MX system could foster direct competition between municipalities, the military, stockgrowers, wool growers, and farmers for reliable water sources; and

WHEREAS, a program of the vast magnitude, proportion, and time span of the MX system holds the possibility of altering our pursuit of Wyoming's traditional sportsmen's values and activities centering upon the land; and

WHEREAS, security measures necessary for the MX system could deny access to outdoor enthusiasts, ranchers and farmers to lands presently used for agricultural and recreational pursuits; and

WHEREAS, it is a responsible exercise in good environmental stewardship for the Federation and the Wyoming Citizenry to examine and address those issues which may directly affect the sportsmen of Wyoming;

NOW, THEREFORE, BE IT RESOLVED that the Wyoming Wildlife Federation in annual meeting assembled in Casper, Wyoming, April 8, 9, and 10, 1983, does hereby pledge, in the strongest and most sincere terms, to seek ,honorable commitments from governmental, military, and private sector planners, strategists, contractors, builders, overseers, and public officials elected and appointed, to establish effective and acceptable long-term, MX-related, mitigations for Wyoming wildlife, Wyoming resources, and Wyoming people; and

BE IT FURTHER RESOLVED that the Wyoming Wildlife Federation pledges to seek ,honorable commitments from aforementioned principals, to plan ahead in good faith so that the entire MX-related construction project is environmentally sound and completed right, and properly the first time; and

BE IT FURTHER RESOLVED that the Wyoming Wildlife Federation, through its Executive Committee, Executive Director, Board of Directors, and membership will commit itself to monitor, challenge, and make public pronouncements

on any abridgement of sound environmental stewardship regarding the MX and subsequent projects as well as any departure from wise resource management safeguards; and

BE IT FURTHER RESOLVED that the Wyoming Wildlife Federation will provide full cooperation and assistance to all interested parties and principals, in identifying areas of environmental concern and in seeking workable data and solutions, to adequately address such concerns.

Page 3 of 3

WILDLIFE FEDERATION TO ASSUME WATCHDOG ROLE

Tom Dougherty, Wyoming delegate to the National Wildlife Federation, announced that the group's state affiliate, the Wyoming Wildlife FEDeration, will monitor, speak publicly, and challenge any abridgement of sound environmental stewardship in the bu of the MX missile system in Wyoming.

"The Federation recognizes and supports our nation's commitment to strength through preparedness. If Congress authorizes the MX program, the Federation simply wants the planners and builders to do it right the first time, with workable safeguards for sportsmen, ranchers, and farmers," he said.

"We are not opposing the MX system. The Federation stands ready to provide full cooperation and assistance in identifying areas of potential environmental consequence during the construction period. We want to contribute in the search for solutions we can all live by."

Dougherty said that the Federation Board of Directors is concerned about limited access to hunting and fishing spots normally frequented, possible hunting and fishing license fee increases, quotas on the number of licenses issued, harvesting limits on game and fish, and adverse conditions posed by a quick influx of people.

"MX consequences could be particularly acute since no wildlife trust fund or in-stream flow laws are on the books to protect and maintain the wildlife resource over the long haul," he said.

"Effective mitigation to soften the impacts is the primary goal of the Federation. Estimates of worker and resource requirements released so far address only the shortrun. We need complete figures on the extended long-term MX requirements, not just on 'Phase one' of a fifty part plan. The President himself has stated that he wants deceptive basing and an ABM system as possible follow-ups to protect MX.

--Continued

Page 1 of 2

--Continued--

Dougherty said the Federation will assume an up-front role to work with government, military and private sectors to ensure that wildlife's future is compatible with "the largest potential demand for western land and water ever."

He emphasized concern for the land and water interests of the agricultural community amidst an MX complex.

"Stock growers, wool growers, farmers and sportsmen all have a common interest in husbanding our natural resources. The Federation will try to work closely with ranchers and farmers to get reliable answers to project requirements right from the start, so that agriculture can retain its vital place in our state's economy."

Dougherty said the Federation is concerned about agriculture and wants to help because "Ranchers and Farmers, among others, have always done a fantastic job to make Wyoming's wildlife resources one of the nation's best."

"Wise management of wildife and natural resources will be more important now than ever before, in light of the MX decision."

Page 2 of 2

12 Rock Springs (Wyo.) Daily Rocket-Miner Wednesday Morning, April 13, 1983

Wildlife Federation Vows To Monitor Environmental Effects Of MX Basing

CHEYENNE, Wyo. (AP) — Should MX basing in Wyom... The Wyoming Wildlife Federation, "The federation closely ...ation will monitor the proposed system the planners and builders ...lopment of the MX missile to do it right the first time, ...Wyoming and challenge "any such workable safeguards for ...abridgement of sound environmental stewardship, sportsmen, ranchers and farm... ...ensible stewardship," the con...

group's president announced. A special presidential com... This Dougherty of Cheyenne, mission released a report Mon... president of the organization, day recommending production ...ormed a news release Tuesday of 100 MX missiles and plac... saying the outdoors and con... ...ervation group supports the missile silos in Wyoming and ...United States' commitment to Peacemaker. President Reagan h... ...national defense. announced to set on the report said.

But he said if Congress au... ...ment week and refer the issue to Congress.

Dougherty said the federation wants to work with the govern... ment in identifying potential environmental impacts from the missile placement.

The federation's directors are concerned about limited access to hunting and fish spots, possible hunting and fishing li... ...ense fee increases, quotas on harvesting limits and "adverse conditions posed by a quick in... ...flux of people," Dougherty said.

The new basing proposal would require a peak construction workforce of about 3,000 and a permanent addition to the staff at Warren Air Force Base at Cheyenne of 300.

"MX consequences could be particularly acute since no wildlife trust fund or instream flow laws are on the books to protect and maintain the wild... ...resource over the long haul," he said.

Dougherty said the federation wants long-term workers and r... ...source requirements, "not just on phase one of a 50-part pl... ...gram."

He cautioned the biggest land and water use on the st... ...national community, which land also will be used to ... the MX.

"Stock growers, wool gro... ...ers, farmers and sportsmen a... ...have a common interest in ... ...husbanding our natural resources. "The federation will try ... ...work closely with ranchers and farmers to get reliable answ... ...to project requirements ri... ...from the start, so that agric... ...ture can retain its vital place ... our state's economy," Dougher... ...said.

Missile Engineering

Aviation Week and Space Technology Magazine January 10, 1983

Future Growth Key to MX Site Selection

By Bruce A. Smith

Los Angeles—Capability for possible expansion of an MX environmental ballistic missile system at Warren AFB, Wyo., to include more missile capacity for deterrence basing or the addition of a defensive system were major considerations in the siting process that led to the selection of Warren, Air Force officials said.

In the wake of congressional action less than year, Air Force officials have begun gathering data that will be used to support addition of closely spaced basing, as well as deceptive and other possible MX basing concepts. Program officials said closely spaced basing is more than remains a viable option.

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TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-318

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TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-406

323

QUESTIONS OF VITAL IMPORTANCE

Environmental Impact Statement

November 3, 1983

These are some questions of great concern from the residents of Goshen County resulting from the deployment of the MX missiles

1. Buried cable construction requires 35 ft. of right-a-way.
   - 114 a) What will the Air Force do as a result of damages?
   - b) Time delays?
   - 1391 c) Settling of the land once cable is buried?
   - 1138 d) What time of the year will trenching occur?
   - 1145 e) Can agricultural improvements such as additional pipelines be buried through cable paths?

2. Land Use
   - 188 a) additional land is required but can improvements or buildings be constructed near launch sites?
   - 185 b) What alternatives do families located near launch sites have?
   - 188 c) can irrigation improvements be located near launchsites?
   - 175 d) what if excess trash is noticed around silos and road ways who should be contacted for removal.

3. The Wheatland-Whalen Fault Zone represents a potential for earthquakes.
   - 174 a) what are the consequences of an explosion at a launch site as a result of an earthquake?

4. Water and Electricity
   - 198 a) water to be used will have to come from a local source. In the event of a drough, will the Air Force have priority to irrigators ?
   - 962 b) will the electricity have to be shut off for any period of time?
   - c) will these shut offs be during peak demand for irrigators?.

5. Hazardous Materials
   - 155 a) The use of plutonium is extremely dangerous, what steps will the Air Force take to educate people in the event of a mishap or accident?
   - 168 b) Will our land produce or drop in productivity if plutonium is released.
   - c) can animals be harmed by plutonium?
   - 155 d) if a spill or accident does occur will all roads be shut down
   - 168 e) the solid and liquid propellants are extemely dangerous. what are the conmequences of their detonation?

Questions are viewed by WAMX chapter from Goshen County

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TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-421

325

145 During installation will our county roads be closed & if so for how long? Day, week - month

326

11/3/83 Torrington Wyoming

139 During the Minuteman missile work, (1981-83) there are at least two instances where women and their children were in cars, traveling on the country roads, & with the transporting military vehicles, traveling, the civilian cars were forced off the road.

This is understandable, but a plan should be made where the women & children can be checked, & get "unstuck."

One lady had to walk 2 miles with her child in a blizzard, to call for help. The other one requested the military to send assistance. Some one came to help by radioing a Chaplain's aide & the Chaplain & his aide came to help.

A plan should be incorporated into the missile plan, to prevent fatalities.

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TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-443

328

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-320

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-464

330

Norman E. Austin
612 S. Cedar Street
Kimball, NE 69145

November 7, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept. of Air Force, AFBCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

In attending the Public Hearing on the DEIS in Kimball, Nebraska on Friday evening November 4, 1983 I did not sign up to speak because I believed the concerns I have would be addressed. However I find that not all the concerns were addressed.

I confess that I am a person who locks my house. I also lock both of the churches I serve as Pastor. I also lock my car. I am aware that the local police randomly patrol the residential community where I live. I do not feel more secure for taking these safety procedures for I know my residence could easily be broken into in spite of the locked doors and random police patrols. I could triple the door locks and bar the windows but that would only mean a few moments more for someone who wished to violate the privacy of my residence and increase the damage in gaining entry.

The issue, as I see it, is what sort of person do I become if I live by my fears? What sort of people do we become?

104

We live in a great land which highly values freedom. We denounce east-block countries for their imprisonment of dissidents, yet in the "free world" we have the second highest rate of imprisonment of any nation. Does that not indicate something of the paranoia and violence in our nation which more security does not deal with at all?

In seminary one of my classmates was a professional wrestler. Tiny weighed 350 pounds and certainly could be an impressive, intimidating figure. Occasionally he would engage in his professional sport to pay his bills much to the embarassment of the seminary administration. He sought an alternative way to finance his education and applied to a nationally known security agency to work as a security guard. He was rejected because it was feared his theological training would make his hesitate a fatal moment in a situation that could require violent force.

The young men and women who provide the security, maintenance, and ultimately must launch the MX missiles, instruments of violence, destruction and death, have been taught to believe in God and the sanctity of human life. As a part of our defensive forces they are trained to act automatically without thinking of the moral implications of their acts.

Repeatedly our nation has held that an individual is responsible for his/her acts and the rationle that they were just following orders is not acceptable.

Is it perhaps the fear that individuals may have moral reservations about launching these deadly missiles that a cable to link the 319th and 400th squadrons together is needed so that any one of ten persons may launch all 100 missiles?

Coming to Kimball six and a half years ago, I noticed that no one talked about the missile silos which dot the land. I how hear people say that they have lived with these missiles for many years and they do not fear them. That smacks of the young lad whistling past the graveyard to keep his courage up.

On October 31st I asked members of my congregations to complete the following sentence to help them claim the faith by which they live: "When I die I would like ..." One person completed the sentence as follows: "to go with a natural death, not of a nuclear war." There is a paralyzing fear of these awesome weapons. I believe people do not talk about them or even see them because they can not deal with the reality and horror they represent. Like death, they are subjects which people do not discuss.

104

I have heard parishioners and members of the larger community say that they would just as soon be incinerated or vaporized in the event of a nuclear exchange as to survive. I too am tempted to desire that choice in the event of the unacceptable. That is an adult choice. But I do not accept it for my granddaughter nor my neighbors' grandchildren or the thousands of children "who can not tell their right hand from their left." I would claim another vision and alternative for them and their parents and grandparents.

The prophets of Israel saw national enemies as the instruments of God's wrath and judgement. It was not an irreversible vision but a call for the nation to live by its faith in God who forgives, renews and empowers his people to live by his precepts of compassion, mercy and justice.

"Peace through strength" is a nice-sounding phrase. I do not know what an adequate "strength" would be. I do know that I am not willing to leave that decision to experts who consistantly want more powerful, sophisticated and expensive weaponry.

A wise person has said, "Choose your enemies carefully for you shall become like them." Living out of our fears we are increasingly becoming more like the "evil we deplore."

The DEIS does not address, at least as far as I am able to discern, the questions of compromising moral values for the young men and women who maintain and secure the missile sites. It does not address the question of compromised moral values of construction workers and their families. It does not address the question of the adverse psychological impact upon the civilian population most immediately affected by deployment of the MX missile. It denies the "fear" by a euphemism "peacekeeper." President Reagan in a radio address sought to calm the fears expressed in a letter

- 3 -

104 by a young girl, but the DEIS does not address such fear and its psychological and moral impact upon people at all. I would hope that these issues will be addressed in the EIS due out by January 31, 1984.

494 A second concern that I would express is brought to focus by the information contained in the DEIS noting that Kimball County has a higher then average per capita income for the state but also a higher than average percentage of persons living below the poverty level.

A strange irony of our economy is that the more affluence you find in a community the more poverty will also be there. I do not think the DEIS adequately addresses the impact upon those in the community who already live below the poverty level; nor does it adequately address the projected increases in the number of persons making demands upon already strained social services. What will be the needs of unsuccessful job seekers upon the strained social services? What will be the impact when job terminations begin? What will be the impact when weather interrupts construction?

581 579 580

I respectfully request that these concerns be addressed in the EIS.

Sincerely,

The Reverend Norman E. Austin

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-468

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

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TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-434

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-459

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TESTIMONY FROM

WHEATLAND, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-390

336

Review of Wyoming and Nebraska Socioeconomic Impact Study -- Volume I
Department of the Air Force

Review by Tom Bougsty, Ph.D.

Out of respect for the obvious efforts which went into preparation of the WNSIS, I will start with a positive comment. The Air Force's and URS-Berger's efforts to gather baseline information, particularly on local human services, and then translate it into a generally readable document with some degree of brevity is appreciated. Unfortunately, their efforts fell far short of being an adequate document.

Since my expertise is primarily in the human service area, I will direct most of my criticisms to that area. I will limit my comments predominantly to the 1.3 Summary of Socioeconomic Impacts section, as I simply do not have the time to make comments on deficiencies I see for each human service agency. Before initiating this review, I will describe several important methodological deficiencies in the WNSIS projections of impact which make estimates unacceptably low and misleading.

1. Assessment of Human Service Impacts over Human Impacts

739

Their most critical deficiency is considering only impacts on human service agencies and not impacts on local residents. Generally speaking, the primary impacts are on residents; secondary impacts are on human service agencies. Only when people are hurting (primary impacts) will they turn to human service agencies and stimulate the secondary impacts the Air Force has chosen to study. To limit baseline data collection to secondary impacts on human services is not only misguided, but also irresponsible and dangerous economically, socially, and psychologically. (See the attached Social and Psychological Problems Documented in Boom and Bust Communities for a literature review on the high rates of mental health, alcohol abuse, crime, and youth and family problems empirically documented in Rocky Mountain rapid growth communities. Also see Costs of Human Problems included in that paper.)

To provide a concrete example of significant deficiencies built into their approach, we merely look up the road to Wheatland and learn from their impact experience. In Wheatland human service impacts were assessed and monitored. Impacts on Wheatland residents were not assessed or monitored. The consequences were as follows.

During the peak of Wheatland's impact, 3.5% of the residents were using the mental health center. Simultaneously, the most valid and reliable research done to date in a boomtown demonstrated that 36% of the adults in the community needed mental health services. Reliance on data only from the mental health center underestimates the problems experienced by residents by greater than 10 to 1. An even greater misrepresentation of

the true impacts on Wheatland were revealed with alcohol abuse. Only one in every 48 men admitting to an alcohol problem sought treatment at the mental health center from which local services were available. The human service method of assessing impacts was grossly inaccurate. This method underestimated problems in the community by 10 and 48 times, respectively, in these two examples.

The consequences of these extremely high rate of problems are largely unknown, but they can be assumed to have significant longterm negative impacts on the community. Some consequences are starting to become apparent. It has been over two years since Wheatland experienced its bust. Despite the major losses in population, the mental health center caseload has steadily increased to more than double the peak impact caseloads. The extremely high rates of "hidden" human problems documented during the peak of impact are apparently now stimulating a secondary impact on the mental health center. No one knows what additional problems still lie under the surface in Wheatland, but certainly there must be some, as the extent and severity of problems documented among the residents during Wheatland's impact would not be expected to simply disappear. More hidden problems may yet surface in Wheatland.

739

Unfortunately, Wheatland had only human service data from which to understand their impacts. The human service data, although of good quality, simply could not "see" the primary impacts on the residents and the extent of problems that existed.

The approach that would have solved Wheatland's dilemma, but which the Air Force has also not chosen, is to assess and monitor impacts directly on local residents. Especially important is to gather baseline data directly from residents in those areas which consistently show impacts (i.e. mental health problems, alcohol abuse, crime, youth, and family problems). With such data Wheatland would have been able to identify potential problems in these areas before impact occurred and to monitor changes in these critical areas throughout the boom and bust periods. This would have enabled the human service sector to recognize and choose timely and cost-effective programs to address the community's changing needs. Justification for prevention/mitigation funding requests would have been available and in "hard data" form.

The bottom line on what we can learn from Wheatland's impact experience is that human service data, although necessary, is simply inadequate for the identification, planning, funding justification, and mitigation of human impacts throughout the boom-bust cycle. Direct assessment and monitoring of residents is also necessary.

Page Three

... WMSIS Projections of Impacts on Human Services Are Significantly Underestimated ...

The WMSIS projections of impact are based on an assumption that population growth is the only variable related to staffing needs. An equation to represent this simplistic means of projecting impacts is as follows:

Impact Projections for human service staffing	=	Present Staff/Client Ratio	X	Percent Population Change

This approach to impact projections for human services is clearly dated and inappropriate relative to current knowledge in this field.

A more accurate and appropriate equation for projections of human impacts would include the following variables:

Impact Projections for human service staffing	=	Present Staff/Client Ratio	X	Percent Population Change	X
		Percent Boom Impact Change	X	Percent Bust Impact Change	X
		Percent Change due to Prevention Efforts	X	Percent Change Due to Unmet Needs	

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This proposed equation is justifiable in terms of the boom and bust literature, whereas the WMSIS equation is not.

Let me briefly explain each of the variables in this latter equation and how they reveal deficiencies in the WMSIS approach to human service projections.

1) The first variable is the present staff/client ratio. The initial question to ask in this area is whether the baseline staff/client ratio is accurate. If it is not accurate (as is the case in the WMSIS document with several agencies described as having fewer staff than are actually present), projected needs for staff will be wrong in all future estimates. If the baseline number of staff is low, as occurs in this case, then future staff projections will be low, resulting in $100,000s of probable funding deficiencies.

Page Four

The second question to ask is whether present staff-client ratios are adequate to meet the present service needs. If they are excessive, then more staff than needed will be projected. If they are deficient, then less staff than needed will be projected. In our situation, several agencies are reported to have too few staff to meet present client needs adequately. Again, this can result in huge funding deficits as too few staff positions are projected relative to future needs. To make projections based on a staff/client ratio which is already inadequate to serve residents' needs would likely lead to a continually overworked staff and low quality of services. Low productivity and high staff turnover would likely follow and result in additional costs which were not projected.

The answer may be to define what is adequate staffing patterns at present. If, for example, more staff presently needed, local funding sources should be responsible for those present deficits. The Air Force should be responsible, but only responsible, for the staff increases their project stimulates. But adequate staffing is critical for Cheyenne as well as the Air Force, to provide the quality services needed to protect our citizens and their workers throughout the impacts.

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2) The second variable, percent population change, is also crucial to be as accurate as possible, for obvious reasons. The WMSIS estimates for population growth appear low, but you are in a far better place than I am to evaluate their projections -- including their design assumptions, methodologies, modeling equations, and input variables.

3) The well-documented psychological and social boom impacts on residents of rapid growth Rocky MOuntain communities are not included in any WMSIS staff projections. This deficiency will likely result in severe staff shortages in a number of human service agencies and huge deficits in funding projections.

4) Bust impacts similarly were not taken into account. High rates of the same types of human problems seen in rapid growth situations (i.e., mental health, alcohol abuse, crime, and family disruptions) have been documented in bust situations. [I am trying to make the time to compose a literature review in this area as well, so we can more accurately project the consequences of the bust on our residents.]

5) Prevention programs to address the social and psychological problems are only minimally mentioned. This represents another unfortunate oversight because prevention programs are our best alternative to minimize the boom and bust situations.

6) The last variable recommended to improve human service impact projections is to identify residents unmet needs and their expectations of human service provisions. The direct identification and monitoring of high-risk groups among local residents would allow more accurate projections

Page Five

of future service needs. The identification of gaps in ... for services would further refine projections of service ... and offer the opportunity to improve service delivery.

In summary, the WMSIS impact projections for human service staffing are deflated for the following reasons:

1) Present staff/client ratios are inaccurate (too low) in some instances. Present staff/client ratios are inadequate to meet current needs in several agencies. Projections of future staff requirements are deflated in each case.

739

2) Population projections, including demographic breakdowns, need to be as accurate as possible.

3) Boom social/psychological impacts must be considered. They are not in the WMSIS document.

4) Bust social/psychological impacts must be considered. They are not in the WMSIS document.

5) Prevention programs are critical to employ to minimize boom and bust human impacts. They are typically not considered in the WMSIS report.

6) Finally, unmet needs of residents are important to identify in order to: a) make more accurate projections, b) prevent and mitigate human problems effectively, and c) minimize both boom and bust impacts on our residents and our local quality of life.

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819 Barney
Laramie, Wyoming 8070
November 9, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept. of Air Force, AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

I have read the Draft Environmental Impact Statement, Peacekeeper in Minuteman Silos and offer the following comments.

Section/Topic	Comments
General 117	The massive inherent in the various proposed mitigation measures will primarily come from the taxpayers, regardless of the level at which the impact is ostensibly addressed. Effects of diverting tax dollars from other pursuits, and/or raising taxes, should be addressed.
Social Well-Being 40	The impact of living in fear of a nuclear war or accident should be addressed -- especially for areas like Albany County which are projected to receive few, if any, of the alleged mitigating benefits.
Page B-12 538	In the "Public Services" section, do considerations of health care include mental/emotional health?
539	The ability of health care facilities to treat nuclear war victims should be addressed.
Pages B-17-19 1418	In the discussion of Threatened and Endangered Species, consideration should be given to species (including humans) that would become threatened/endangered by virtue of nuclear risk.
Page B-19 37	Relative to "Methods, Assumptions, Criteria", why does this SEIS assume there will be no nuclear war when the MX is designed to be operational? A statement is made that this SEIS "assesses the impacts of the deployment and possible operation of the...system...." Why doesn't the SEIS assess the impacts of wartime operation -- for which the MX is designed?
Page I-4	I strongly disagree with the statement that the effects of war are speculative and lie beyond the scope of

37 | deployment' The effects of war are certainly not any more speculative than anything else considered by the EIS -- and are much more significant.

General
48 | Inasmuch as the dEIS was prepared before the Congress had fully authorized the MX, I believe it was very presumptuous for the writers of this document to use the verb "will" rather than "would" throughout the EIS relative to effects of the MX.

General
104 | I am one of many people who strongly object to the term "Peacekeeper".

Page 1-24
138 | I found it very presumptuous on the part of the writers of the EIS to state that the system is to be "fully operational" by the end of 1989 -- given all the variables involved in the funding/construction/permitting/etc. process.

General
49 | I found the material contained in this dEIS to be quite redundant. Among other things, it was a waste of paper to repeat so many statements (e.g., references to the staging areas) in the course of the document.

Page 1-36, App F
138 | What will happen if permits are denied? How can the MX timetable be stated with such certainty when so many permits are required?

Pages 3-16, 3-82
461 | For social well-being the Area of Concentrated Study should be the same as the Region of Influence. Population immigration is only one factor influencing social well-being, there are many others.

Page 3-160
1021 | I find it hard to believe there could be $200 worth of damage in a pedestrian or bicyclist accident with no injuries (3.1.9.1.5, "low").

Page 6-4
51 | The lists of attendees are not complete. I personally know of many people who attended the meeting at which I was present but are not listed, and I know of several people who attended more than one meeting but are listed at only one. Perhaps the lists were compiled from names of those who submitted comments or otherwise made their presence known, but these lists should not be represented as complete. (I saw no organized sign-up program when I attended.)

Appendix D
10 | It is an insult to the people who, in good faith, took part in the Scoping Meetings that so many of their concerns are not adequately addressed. It is also misleading for this Appendix to state that certain issues are addressed in the EIS -- when the EIS's comment is only a statement that the topic is not being considered' I also believe that the "justifications" given for not

10 | addressing certain issues can only be described as unfounded propaganda.

Sincerely,

Sharon Breitweiser

338

Torrington, WY
October 17, 1983

Dear Sir:

155 | Thank you for sending me a copy of the Draft Environmental Impact Statement for Peacekeeper in Minutemen Silos. You asked for comments. You have certainly done a very thorough report on everything that should be considered--except the most important subject of all--and that is the safety and protection of the people who live in this area.

This may be that there is no way to protect us from M X madness. In case of human error in placing these MX missiles, it must be that we are considered expendable. If, accidently or on purpose this region we love so well, would be devestated, and we would all be liquidated--why President Reagan and the top government officials and your Air Force can all say--"Too bad--but they died for their country."

Would you and your loved ones care to make your home in this area? We will have the Peacekeepers keeping us safe*** I can only hope and pray there will be a change in our leadership--and the MX will be canceled by 1985.

Yours truly,

Mrs. Florence Burden

339

TESTIMONY FROM

WHEATLAND, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-391

340

62 12th Street
Apt. A-2
Wheatland, Wyoming 82201
November 27, 1983

AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Major Peter Walsh:

I am sending you a copy of my letter to Wyoming's U.S. Congressmen dealing with my concerns about the psychological effects on children of the deployment of the MX missile in our country. This letter is my response to the Air Force's comments at the DEIS hearing in Wheatland.

On November 3, 1983 in Wheatland at the U.S. Air Force public hearing on the Draft Environmental Impact Statement for the deployment of the MX missile in Minutemen silos, I asked why the draft did not address my previous question posed at the July 1 scoping hearing on the psychological effects on children of the installation of the MX missile in Wyoming and Nebraska. An Air Force official made immediate reference to a recent U.S. Supreme Court decision that stated that psychological injury does not arise out of the direct impact of a change in the physical environment. Upon my further investigation concerning the decisions made in this case, that is, Metropolitan Edison Company vs. People Against Nuclear Energy, I found that the National Environmental Policy Act (NEPA) does not require assessment of every impact or effect of a proposed action, but only those that deal with the physical environment -- air, land and water. In their opinion the Supreme Court stated that "the question of psychological health damage caused by risks generated by modern technology (such as the MX I believe) should be debated in our U.S. Congress, and is not a central concern of NEPA. At this time NEPA does not require the evaluation of the effects of risks on people. Justice Rehnquist does state in his opinion for this case that "Medical experts apparently agree that risk can generate stress in human beings, which in turn may rise to the level of serious health damage. For this reason...the question whether the gains from any technological advance are worth its attendent risks may be an important public policy issue."

With all these statements in mind, I now present my concerns to our U.S. Congressmen. Little systematic research has been carried out in our country concerning the psychological effects on children of the nuclear arms race. However, recent research by Drs. William Bearsdslee and John Mack show that the possibility of nuclear war is on the minds of most young people. The threat of nuclear war gives these young people a sense of helplessness and hopelessness that comes from a feeling that they have no control over their future. I ask what will happen when our youngsters cannot envision a future for themselves and their country. Plans concerning their future may possibly be blotted out of their minds.

40

I strongly urge our U.S. Congressmen to investigate this question: How will the installation of the MX missile affect the psychological development of our children?

40

Sincerely,

Mary Ann Buscaj

Mary Ann Buscaj

341

TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-411

342

TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-416

343

Nov. 15, 1983

Box 180 Rt. 1
North Branch, Mn 55056

AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Sir:

After attending the Public Hearing on Nov. 3, 1983, I am obligated to register a comment.

The budget of the Wyo. Fish and Game Dept. is greatly enhanced by license sales to non-resident sportspeople. Local merchants and servicemen also enjoy greater prosperity from the business these yearly visitors bring.

109 Deployment of the MX will reduce this source of revenue to the State of Wyo. in the same way terrorist actions such as Gettysburg, Pa. experienced a decline in tourism following the Three Mile Island Incident. Personally, my family would decline a yearly hunting trip to Wyo. in the presence of a world crisis, where there was any possibility of nuclear confrontation.

At the Nov. 3 hearing you felt it relevant to counter the question raised by an educator regarding the psychological well-being of the populace and the deployment of this missile with the Dunpaun Court's ruling that the negative effect of nonexistent nuclear power on our psychological well-being is negligible. In light of that, my argument that the MX system's effects on tourism will be comparable to nonexistent nuclear power's effects on tourism is also valid.

You are trying to build a mammoth war machine in haste. You are not giving due consideration to it's effects.

Sincerely,

Colleen Chelemsky

344

November 22, 1983

Andrea Cook
736 Arapaho
Cheyenne, Wyo. 82009

AFRCE-BMS/DEV
Norton AFB, Calif. 92409

Thank you for the DEIS copy that was mailed in late Oct. 1983. The time allowed to respond is very short considering the magnitude of the statement. However, after examining it and attending the meetings that were held in Cheyenne in early November 1983, there are several points that I would like to see thoroughly addressed in the final impact statement. They are:

467 1)--an honest appraisal of the social well- being of citizens who now reside in the area and of those who will come here needing and/or expecting adequate housing, education, medical facilities, etc.

149 2)--unlike the ICBM projects of the early 1960's when out-of state materials and contractors were used, will local builders be invited to bid on the MX construction?

118 3)--what would the effects be on Wyo. and Nebr. if the project is scrapped because of a change in administration or in the lack of funds?

1471 4)--have geographical faults in this area been taken into consideration in case of an earthquake, resulting in damage to the silos?

37 5)--what would the impact of a nuclear holocaust (either from a war or an accident) be upon the citizens of Wyo. and surrounding areas? What provisions has the USAF made to share in evacuation, medical care, etc?

1479 6)--The DEIS concluded that noise would have no impact on Cheyenne or Laramie county. With the significant increase in population and the equipment involved in the project

1479 resulting in heavier traffic and noise, this is a glaring omission in the conclusions of the study.

104 Finally I would like to state that on moral grounds I oppose the MX and the appalling build-up of nuclear weapons in this country and around the world. When will the leaders and military depart from a pre-1945 mentality? Deterrence has worked up to a point. However, when it fails, the results will be catastrophic. The new weapons (i.e, MX) only make the consequences more precarious. Deterrence will be a hair-trigger situation.

The time has come to stop making national monuments of these deplorable weapons. The time has come for the few in power to relieve the world of a nightmare that is becoming closer to a reality.

Andrea L. Cook.

Andrea L. Cook

345

1476 Tyrell
Park Ridge, IL 60068
November 21, 1983

Major Peter Walsh
AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Major Walsh:

My comments concerning the Draft EIS Peacekeeper in Minuteman Silos are as follows:

1420 1. I strongly object to Proposed Alternative MX since it would seriously jeopardize the endangered species Oeneis mackinleyensis ssp. coloradensis (Colorado Butterfly Plant). This plant is found in Wyoming only on and adjacent to Warren AFB.

2. Every effort must be made to utilize existing roads on Warren AFB and to use the Design Option in Alternative E1 rather than the construction of new roads so as not to further endanger the Colorado Butterfly Plant.

1440 3. Every effort should be made not to decrease or increase water levels on Warren AFB but rather maintain existing water levels to insure the continued survival not only of the Colorado Butterfly Plant but the continued existence of the biologically highly significant riparian/wetland community that still exist on portions of Warren AFB in relatively pristine (preSettlement) condition.

4. Due to the harsh rural quality of the riparian/wet land habitats along Diamond and Crow Creeks and the presence of Colorado Butterfly Plant on Warren AFB, Air Force authorities should take initiatives to insure their continued existence not their extermination. The biologically significant portions of Warren AFB should be afforded permanent protection as natural or scientific areas and should be designated as such by the Air Force.

Consideration of the above comments is imperative. Thank you for your cooperation in these important matters.

Sincerely yours,

Erwin P. Ewert

346

Human Service Mitigation (p. 2-307) the measures offered are nonspecific to agencies and problems, therefore they lack meaning and/or usefulness.

Monotoring program is recommended, however, the statement is vague, relative to fiscal responsibility and communities capability and competence to respond to identified needs.

The statement should be clear in its philosphical objectives, method and fiscal responsibility.

595 The method should identify strategies to amend and respond to :

1. demographical types , changes and numbers
2. types of problems
3. staffing adequacy
4. program capabilities and responsiveness relative to problems
5. development of Human Service Council and/or association with communities participation and input.
6. Training and technical assistance to administrators
7. staff education/and development to meet impact generated changes
8. identify communities fiscal capability and alternate funding resources for monotoring and mitigation effort.

Submitted by
Maj. J. Faccendola RN

347

TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-470

348

November 4, 1983

United States Air Force
AFSCD-SMS-DSV
Norton Air Force Base, California 92049

Gentlemen:

This letter is in reference to the shuttle concept for the M. X. missiles.

Whether the information contained is timely or of any value to the air force will be best judged by you. However, I'm confident you will find it has merit.

In keeping the objectives in mind of the shuttle systems once proposed for the M. X. missiles in Nevada and Utah, which has run into several obstacles lately, one being, its highconstruction costs.

124 I have developed a similar concept for the transporting of missiles underground and at any distances at a substantial savings to all concerned, relative to the current estimated cost of such a project.

Not only would a monetary savings be realized, but also construction time would be considerably reduced. This unique design could also be employed in many other areas of the country.

I'm confident it would be in your interest and that of the defense department to allow me to explain this concept further.

I realize this is an unsolicited idea. However, I believe in the best possible defense for our country. Therefore, if your interested in further details please have a representative contact me.

Respectfully,
Ronald L. Fischer
700 Windriver Drive
Green River, Wyoming 82935

349

Kathy Faccis
Box 3634
Casper WY 82602
11/23/83

Major Peter Walsh, Director
Environmental Planning Division
AFRCE-BMS
Norton AFB, CA

Dear Major Walsh,

I read the Draft Environmental Impact Statement for Peacekeeper in Minuteman Silos. Because I am a hydrologist I was especially interested in the sections pertaining to water. Below are my comments

23 1) More time should have been granted for review of the DEIS. The existance of the document in the Natrona County Library was not well publicized and I personally was not able to read the DEIS until well into the comment period. It wasn't possible for one to obtain the data needed to completely review the DEIS in the several weeks allowed. Most of the necessary data is only available through interlibrary loan or would require travel to Cheyenne during business hours.

1286 2) Drought conditions are not adequately covered in the DEIS. Although the authors content

that the study period, 1977 to 1982, contains both wet and dry years, the data are quite insufficient to project future water supply accurately. Drought, like flooding, may be considered an extreme event. Its probable occurance must be modeled using the longest

1286 precipitation records available. At least 50 years of data are available for the Cheyenne airport and should therefore be considered.

there are several reasons that proper evaluation of drought is important. The first reason is that much of Cheyenne's water supply is sensitive to drought conditions. Another

1340 reason is that a drought may result in overpumping of the existing well fields, which could then lead to increased drawdown, subsidence, and higher pumping costs. Also, drought would compound the problems of

1302 short water supply faced by Cheyenne residents, which will be extended beyond the appearence of Stage II water by MX construction. This water shortage is depicted in figure 3.21-1 of the DEIS. Yet another reason is that drought has many secondary

1315 effects such as increased wind erosion, decreased revegetation sucess rate and enhanced dirt road dust problems.

3) Project delays on on Stage II may cause hardship to the citizens of Cheyenne because of the increased water demand due to MX construction. Project delays

1287 on the MX construction would serve to extend the period of water use and to increase the total ammount of water needed for the project. Delays are likely in Wyoming where harsh weather is common, and these should be addressed.

4) It is unclear from the DEIS exactly where the water for silo construction will come from. The document states on section 3.2.2.4 that "Construction water is to be supplied by development of new ground water supplies or purchase or temporary use of existing water rights following procedures of the states.". this statement is so vague as

1288 to make it almost impossible to review any effects use of construction water will have on the region. However, I will comment that most of the MX impact area in Wyoming is in a designated ground water control area, making it legally very difficult to drill a new well. Therefore, It must be assumed that the MX construction will require purchase or temporary use of existing water rights. the effects

of the change of use of water

1290 was not addressed in the DEIS, as they should have been. If the existing use is domestic or stock water, then where will the current users get water to meet their needs? If the existing use is for irrigation, several

201 points should be covered. First, have the Air Force and the State of Wyoming worked out a policy where the water rights temporarily used by the Air force will not be subject to abandonment while used in MX construction. Second, the effects

1140 of removing lands from production by halting irrigation were not addressed these effects will include increased wind erosion, loss of farm revenues, and weed intrusion.

Another question not answered in the DEIS

1289 is how the water will be delivered to the construction sites. Will tanker trucks or pipelines be used?

the DEIS was much too vague concerning construction water.

thank you.

Sincerely,
Kent Haeseus

350

FF- William E. and Christine L. Francis
1825 Campstool Road
Cheyenne, Wyoming 82007
(307) 632-8143

November 21, 1983

To the U.S. Dept of the Air Force

R.E.: Draft E.I.S., Peacekeeper Missiles

To whom it Might Concern,

I shall make this as short and concise as possible. I write you with the hope that the Air Force will read and consider my comments and those you receive from other concerned citizens. We would not write if we did not care!

103 Know that I favor the deployment of the Peacekeeper Missiles. My interest lies in the E.I.S. dealing with water in Laramie County. I am a rancher. We have no Minutemen sites on our land.

1338 Your statistics obtained from various government agencies have been compiled for years. Consequently, your coverage of municipal water consumption is very likely correct. However, the report is extremely vague when addressing water volume, consumption, use of and, in particular, impact on the ranch wells near the missile sites. The statement on page 3-229 "Determining precise impacts will require monitoring during construction." IS NOT GOOD ENOUGH! You are so prepared to present municipal and surface water impacts. WHY don't you have any specific information on the sites? Could it be because no other government agency has the data for you to readily use? If the Air Force was going to drill on my land,

I assure you, I would be actively investigating what would the impact on my wells be.

The entire report was worded so that an ordinary person could not understand it. I truly waded through it -- but did not
44 let the complicated sentences discourage me. Can't the same report be written made simply? Or was it purposefully structured to eliminate readers?

The Air Force is a part of Cheyenne and people in Wyoming accept the current missiles. They will make room for the
5 Peacekeeper, too. However, public relations are suffering. You must tell people the truth if you expect any credibility in our community.

The report I reviewed is disappointing in some areas and you should be made aware of it.

Thanks for the opportunity to express my feelings.

Sincerely,
Christine L. Frances

15 Nov 83

A C GENZ
1809 E 1ST STREET
LANDER, WYO

AFC. BMS/DCV
Norton AFB. Calif 92409

Nov 7
1983

I am definitely opposed to
104 putting any MX nuclear
peacekeepers in minuteman
silos in Wyoming, Nebraska or
also in Wyoming elsewhere in the U.S.A.
any where else in the U.S.A.
also that our World Leaders
should be ever out laws
the use of nuclear war weapons.
the use of nuclear war weapons.
please acknowledge your receipt
and understanding.

Respectively.
A. C. Genz

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • STEVE FOWLER • DIRECTOR

MEMO

TO: Norman L. Greene

FROM: Gayle Malmquist

DATE: October 7, 1983

RE: Draft Environmental Impact Statement - MX Missiles - Nebraska Review

On October 7, 1983, the Air Force is presenting to the Environmental Protection Agency the Draft Environmental Impact Statement done in connection with the siting of the MX missile in Minuteman silos located in western Nebraska and eastern Wyoming. It is anticipated that you will receive your copy of the study by October 14, 1983.

The review period for this draft document ends on November 28, 1983. Comments should be returned to the Policy Research Office by November 21, 1983, so that the Nebraska response can be compiled and transmitted to the Air Force in time to meet the deadline.

The draft document is being distributed to selected state agencies both in Lincoln and the Panhandle, all State Senators, officials in the three impacted counties (Banner, Kimball and Scotts Bluff) and other interested groups. If you wish more specific information on the distribution list or have other questions relating to this review, please contact me at the Policy Research Office. Upon completion of your review, the form below must be returned to this office. Attach your comments to the form or indicate that you have no comment.

Thank you for taking the time to examine the document. I look forward to your response.

Please return by November 21, 1983

We have reviewed the Draft Environmental Impact Statement.

103 ☐ No comment. Better to have the MX here than to let Russia throw them at us
☑ Comments are attached. with no fear of reprisal.

Name Norman Greene Title Chief

Office Box 218 Buckwild NEB 69128 Date 10-13-83

RECEIVED
OCT 17 1983
POLICY RESEARCH

Policy Research Office, Room 1321 State Capitol, Box 94601, Lincoln, Nebraska 68509-4601 Phone (402) 471-3454
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR "PEACEKEEPER IN MINUTEMAN SILOS"

1.) No adequate reason has been given for not including the environmental effects of a nuclear strike against Peacekeeper missiles in the DEIS. Assessment of these effects is not totally speculative, as claimed. Nuclear weapons have been detonated in the past, and impacts of a strike against Peacekeepers will have to be predicted from tests and from Hiroshima and Nagasaki, extrapolating to the several hundred warheads that might be used to attack the deployed Peacekeeper missiles.

All environmental impacts addressed in the DEIS are predicted on the basis of past experience and extrapolation. The effects of a nuclear attack can be approached in the same way. That these effects are "outside the peacetime use" of the missile is totally irrelevant; nuclear warheads such as those on the MX missiles are military weapons of tremendous power, and any Environmental Impact Statement that does not deal with the use of this power or the equally great power that it might attract in order to destroy it, does not fulfill the purposes of the National Environmental Policy Act.

Several United States Government-sponsored studies since 1975, such as the Office of Technology Assessment's volume "The Effects of Nuclear War", show that the effects of nuclear attack are estimable, to a limited extent. Moreover, a conference of leading U.S. scientists meeting recently in Washington went so far as to predict the climatic effects of several nuclear war scenarios. In this
37 context, an estimate of the impact of at least an isolated nuclear attack on the deployed Peacekeepers can and should be included in the Final Environmental Impact Statement.

2.) Regardless of the exact effects of a nuclear attack, all who spoke of such an attack at the scoping hearings felt that the adverse impacts would be greater than all the impacts mentioned in the Draft EIS.

Therefore, as I said at the scoping hearings, the Final EIS should at least deal with the effect of MX deployment on the probability that a nuclear attack will occur. References to the Scowcroft Commission report do not do this adequately. I submit that since "it is a fact that the MX program will have some first-strike capacity" (quote from General Lewis Allen), deployment of these missiles will probably stimulate any Soviet tendencies to paranoia which may have been expressed in the shooting of Korean Air Lines flight 007. Any increase in Soviet fear for destruction of their own nuclear deterrent will probably increase the likelihood of their missiles being used. The Final EIS should examine these possible effects, and there are certainly psychologists qualified to do this.

3.) At the first scoping hearing in Cheyenne, state Representative William Edwards expressed a concern that MX deployment will cause substantial emigration from the Cheyenne area, because of increasing public concern about the possibility and
219 horrible effects of a nuclear attack. At all the scoping hearings, it was clear that a number of residents believe that the MX missiles will attract a nuclear attack. The Air Force has made no effort to determine how many of these people there are, in addition to those who spoke, or to determine how many will in fact move elsewhere if MX missiles are deployed, because of their fear. Such a disruption in the lives of these people, as well as their neighbors, their employers or employees, and others, would be a significant adverse impact that should be addressed in the Final EIS.

4.) The Draft EIS completely fails to deal with concern over the effect of a
168 nuclear accident on wildlife, mentioned on page D-5 of the document. Since the unusual opportunity to enjoy wildlife is a major reason that people choose to live in Wyoming, this is an unacceptable omission, second only to the failure to deal with effects of a nuclear attack or accident on human beings.

Julian L. Hadley
Julian L. Hadley
908 Garfield St. Apt. 5, Laramie, WY 82070

Rec'd 2 Dec 83 354

KEITH HADLEY
1614 S 3RD ST
LARAMIE, WYO 82070

11/27/82

MAJOR PETER WALSH
DIRECTOR ENVIRONMENTAL PLANNING DIVISION
DEPT OF AIR FORCE
AFRCE-BMS, NORTON AFB, CALIF 92409

DEAR MR WALSH

PLEASE INCLUDE THE FOLLOWING COMMENTS AMONG THOSE RECIEVED CONCERNING THE ROUGH DRAFT OF THE EIS 'PEACEKEEPER IN MINUTEMAN SILOS' THANK YOU

REVIEW OF THE DRAFT EIS CONCERNING PLACEMENT OF THE MX MISSILE IN MINUTEMAN SILOS IS REMINISCENT OF THE PACIFIER GIVEN BY INTOLERANT MOTHERS TO THEIR CRYING BABIES. WHY SUCH AN UNFAVORABLE REVIEW? FIRST THE EIS IS AN ATTEMPT TO INVOLVE THE CITIZENRY IN THE MITIGATION OF CERTAIN ENVIRONMENTAL
76 IMPACTS PER ACCEPTANCE OF MX DEPLOYMENT. THE SECTION AMENDMENT TO THE DEPARTMENT OF DEFENSE APPROPRIATIONS ACT 1983 EXEMPTS THE PROPOSAL DEPLOYMENT FROM THE REQUIREMENTS OF THE NATIONAL ENVIRONMENTAL POLICY ACT SECTION, ALTHOUGH ITS INTENT IS RECONCILIATION THE EIS PROCESS TO DICTATE UNAVOIDABLE ADVERSE IMPACT.

THIRD APPENDIX D ISSUES DEVELOPED DURING SCOPING' IS
10 USED TO SCREEN THE AIR FORCE'S (AND ADMINISTRATION'S) POSITION AND FURTHER DISMISS ANY CRITICISM OR COMPLAINTS.

37 FINALLY, SECTION 5 STATES ENVIRONMENTAL IMPACTS OF A NUCLEAR ATTACK ARE SPECULATIVE HENCE, ARE
37 BEYOND THE SCOPE OF 'PEACEKEEPER' DEPLOYMENT AND 'PEACETIME' OPERATIONS. I PERSONALLY REGARD
40 PEOPLE AS AN INTEGRAL PART OF THE ENVIRONMENT AND THAT THEIR PSYCHOLOGICAL WELL BEING AN IMPORTANT ELEMENT DISREGARDED IN THE EIS.

SPECIFIC COMMENTS ON THE EIS ARE DIFFICULT TO COMPILE FOR SEVERAL REASONS, SUCH AS THE DISPARITY
36 BETWEEN DATA SETS USED TO EVALUATE THE VARIOUS IMPACTS AND THE LACK OF A CLEAR AND CONCISE STATEMENT(S) OF METHODOLOGY, ESPECIALLY QUANTITATIVE TECHNIQUES. FINALLY, THE EIS IN GENERAL IS DIFFICULT TO ASSESS AS IT WOULD REQUIRE AN ASSUMED VALIDITY TO THE BASIC PREMISE

RESPECTFULLY
KEITH HADLEY

355

Ed Tyler
Fort Collins, CO 80521
November 18, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept of Air Force, HQ AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

I am writing in regard to the Draft Environmental Impact Statement on the deployment of the MX system in Minuteman silos in Wyoming and Nebraska.

First, I must comment that the document is immense.
76 Yet easy to read. However, it does not appear to be comprehensive in that the proposed action is likely such predicted environmental impacts (such as those upon natural grassland) are shown to be adverse and significant in the short and/or long terms; the mitigation measures
87 are changed yet would have to be funded (which is doubtful) to be effective. In essence, the document seems to be clearly an exercise in futility in that
76 it changes nothing about the MX decision — now or in the future.

The area of environmental impact that concerns me the most is that of "social well-being," a topic that is dealt with unsatisfactorily to me. I question the judgment that overall impacts would be "significant and adverse in the short term and not significant and
40 negative in the long term." I disagree with this judgment as no attention was given to psychological effects of those who may feel more afraid and threatened by the installation of a new weapon system and of its potential use. Again, I question the funding of
464 the mitigation measures.

Furthermore, I find it incongruent and repugnant to suggest that the grant and effort used to conduct frontier days can be transferred to planning for and dealing with such gigantic impacts as adverse
483 psychological and social pressures.

This document obviously justifies the MX project, and I had no doubt that it would. In Appendix O, "Issues Identified During Scoping," the simplistic, one-sided responses to intricate issues such as the morality of
10 nuclear weapons are frightening.

In summary, the statement, while appearing comprehensive and fair, has a hidden agenda — that of justifying the weapon instead of being unbiased. I doubt the value of a scoping meeting for a decision
76 that has already been made and funded. I believe scoping should precede the decision.

Sincerely,
Ms. Gwynne Hallock
Gwynne Hallock

cc: President Reagan
William Armstrong
Gary Hart
Neil Brown

356

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-314

357

TO: Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept. of Air Force, AFRCE-BMS
Norton Air Force Base, CA 92409

FROM: Stanley T. Holmes III
278 'D' Street - Apt. #3
Salt Lake City, Utah 84103

RE: Public Comment on Draft Environmental Impact Statement for proposed Deployment of the MX ("Peacekeeper") System in Minuteman Silos in Wyoming and Nebraska

28 November 1983

Dear Major Walsh,

Thank you for this opportunity to submit my comments and recommendations on the Draft Environmental Impact Statement (DEIS) for President Reagan's proposal to place MX missiles in F.E. Warren Air Force Base-controlled Minuteman missile silos.

It seems to me that those who prepared the document have done a pretty thorough job in many areas of MX impacts assessment. Therefore, what I will do in this public comment letter is identify areas of potentially significant impacts that the DEIS did not address. The following issues should be addressed in the Final Environmental Impact Statement (FEIS) on the proposed MX deployment in Warren AFB silos.

1. The DEIS made brief mention of the Jackson Amendment to the 1983 Defense Appropriation bill, which would allow provisions of the National Environmental Policy Act (NEPA) to be waived for the MX program. Since the entire nation, along with the Warren AFB region, enjoys environmental protection under NEPA, implications of the Jackson Amendment for future U.S. environmental policy and programs should be addressed as part of the environmental impact assessment document for the program made possible by that amendment...i.e. MX at F.E. Warren AFB. A complete FEIS will cite criteria used for the MX exception, and will further identify the potential impacts of programs that may be granted MX-type NEPA exceptions in the future. **79**

2. The DEIS did not address aspects of the MX program that could have significant environmental impacts on the people of my state, Utah. A comprehensive FEIS will include answers to the following Utah-related questions:

A. What would be the economic and social impacts of increased MX spending in Utah ...especially in Salt Lake City, Ogden, and Brigham City? Will those employed directly and indirectly by the MX program be competing with other Utahns for jobs once MX activities have been cut back or terminated? **53**

B. Will those Minuteman missiles replaced by MX be transported to Hill Air Force Base, in Utah, for storage? If so, what dangers to the public are involved in transporting and storing those Minuteman missiles and their nuclear **45**

45 warheads?

C. Since MX and other new Reagan-generation missile warheads will require increased plutonium and tritium production, will Utahns be exposed to any dangers from the transportation of additional reactor waste to the Canyonlands Nuclear Waste Repository?

What would be the potential environmental consequences to northern Utah if a new nuclear explosives production reactor is built --as proposed-- in eastern Idaho? Would the Snake River aquifer be further contaminated? And, **53** what would happen if such a reactor was destroyed by earthquake or terrorist attack, or for some reason experienced a melt down?

Actually, the FEIS should identify all U.S. communities that would be near any facilities and/or transportation lines that would handle MX-related nuclear material. Such material includes uranium ore, warhead contents, and nuclear waste products. The range of possible dangers for each affected community should be described.

D. The DEIS did not address potential risks posed to Utahns by periodic test detonations of MX warheads that would occur at the Nevada Test Site. Since **62** approximately 10% of underground nuclear explosions at the N.T.S. leak radiation into the atmosphere, how severely might downwind residents be affected by MX nuclear warhead tests?

E. While the President claims that MX will deter nuclear war, there is a **106** chance it will not. Would the presence of full-scale MX production facilities and additional Minuteman spares affect Utah's status as a "high risk" area? The FEIS should address the range of environmental impacts on Utah, **37** and certainly on the Wyoming-Colorado-Nebraska area, if MX fails to deter -- or even provokes-- a Soviet nuclear attack.

3. As a U.S. taxpayer, I would like to know the entire range of economic consequences MX might have. What will be the total cost of the MX system if **107** it is expanded beyond 100 missiles to a maximum deployment of missiles and augmentations, such as anti-ballistic missile systems (e.g. LOADS) and multiple silos per MX missile? What are the implications for national economic security of both minimum and maximum total MX system costs? For example, will the construction industry falter if an MX-aggravated national debt increase drives up mortgage and loan rates?

4. The DEIS did not deal with the possibility that there may still be signi- **42** ficant changes in the MX basing program. Over the years, we have seen MX plans shift from Midwest covered trenches to Southwest desert shell games, and from the Weinberger "big bird" to the Reagan "dense pack". Now, it's

42 back to the Midwest with a Minuteman retrofit. In order to make a convincing case for the latest MX basing plan --and to ensure that this is indeed the last basing plan pursued-- the FEIS should include impact comparisons between MX in Warren AFB silos and any other MX basing plans that might be introduced or resurrected.

5. The DEIS does mention the Scowcroft Commission Report, but fails to note that the commission: a concluded that there is no "window of vulnerability" and, b recommended moving away from multiple-warhead missiles to smaller, single warhead missiles. While the commission went on to disregard its con- **108** clusion and recommendation by endorsing the MX program, I am concerned that the presumption of need for MX underlying this latest DEIS may be different from that underlying the MX Milestone I and Mil e II documents. Given the Scowcroft Commission Report and other U.S. government strategic studies, hearings, and directives that have occured since release of the Utah-Nevada MX Deployment Area Selection and Acquisition EIS, I think that it is imperative for the upcoming FEIS to provide the American public with a detailed explanation of the current rationale for proceeding with MX production and deployment.

Finally, I request that you include all public comments --in full-- in the FEIS. Please send me a set of all FEIS documents as soon as they are available.

Thank you for your serious attention to the foregoing.

Sincerely,

Stanley T. Holmes III

Stanley T. Holmes III
278 'D' Street - Apt. #3
Salt Lake City, Utah 84103

358

20 "Dear ... your letter, explaining the ... hearings, I received on the MX ... in my mailbox at the ... of the MX's in Nevada? ... Can you ... and send me an reply??

104

Thank you for your comments on the Peacekeeper Draft Environmental Statement. Your comments, along with all other comments received, will be reviewed and considered in the preparation of the Final Environmental Impact Statement.

Air Force Regional Civil Engineer
Ballistic Missile Office
Environmental Planning Division
Norton Air Force Base, CA 92409

Elizabeth Marsh Jensen

359

[redacted]
[redacted]
[redacted]

10/23/'83

Major Walsh
Norton Air Force Base,
California.

Sir:

Will you tell me how I can return, COD, the huge, heavy parcel of "literature" I received from Norton Air Force Base last week? I want nothing to do with it, have an electric furnace so cannot burn it there, the tall weeds all about the place are too dry to dare burn it outside; and since it did not come via postal service, I cannot return it that way. Please instruct me.

25

I hesitate to send it COD, since I know that tax payers are caring for this outregeous expenditure of money- money for postage, and for composition of the contents. Just the cost of sending this one parcel to me is big, and it is multiplied thousands of times over, as I well know. To call these MX Missiles Peacemakers is a travesty.- a sad one. When nations prepare for war, they get war- and MXes are surely a part of such a program— not peace. We are witnessing that fact again this morning, as I listen while writing to what has just happened in Lebanon.

104

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To indicate that fair hearings were provided in this area where the missiles are supposed to be installed is not accurate. Presentations were made by Air Force personnel with pro-MX bias, as were interpretations given to the press.

And I have little doubt that before the installations are made— if they are — the missile will be outdated, just as the million dollar Minute Man installations were before they were completed. I was told by workmen at the time those Minute Man missiles were in progress that they were already out of date, even before completion. While I would of course rather they were outdated than used, I strongly protest having one cent of my tax money go for such outregeous and irresponsible spending. And this when millions of people in the world are suffering terrible hardship because of past wars.

104

When before final decision has been made that the MXes will be installed, huge preparations are being made right now in our own neighborhood at the Minute Man sites. We are surrounded by abandoned Atlas Missile sites, and Minute Man silos. It is costly folly- tragic folly. Tell me what to do with this unwanted "literature"

Very sincerely,

Elizabeth Marsh Jensen

360

TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-431

361

November 25, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Depart. of Air Force
AFBMD-EMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

The following comments/questions we have regarding the DEIS for the MX Missile System concern the cultural resource section (section 2.1.12). For the sake of brevity we have simply listed them. Wherever appropriate we have included copies of those pages from the DEIS to clarify questions/comments.

1264

1. What is the difference in "American Indian" and "prehistoric cultural resources"?

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2. The investigators who performed the work for the DEIS in cultural resources were not qualified to assess and evaluate such resources in this culture area.

1259

3. If Albany County is included in the "Region of Influence" what work in cultural resources is anticipated for this area and where will it be performed in the County. How will you make sure that investigators chosen to do the work will be qualified for this culture area?

1260

4. P. 3-197: It is stated that you do not have enough information on cultural resources in the area to "identify all properties that will be affected by project-related activities". ..."As further data to predict the precise numbers, kinds, and conditions of resources subject to direct....." What does this mean? Do you plan to predict this after the EIS process is finished? How can the public assess impact when the DEIS states that not enough information is available?

1250

5. P. 3-199, 3.1.12.4: "It is assumed that existing resource inventory data...." This section states that you are provided with an accurate approximation of the extent of cultural resources in the Region of Influence by looking at 5% of the area. This is not adequate!!! How did you determine that this was adequate? If the Air Force was planning to inventory this area, why was it not done prior to the publication of the DEIS so that the public could validly assess the document. Now, we have no real information on which to base our decision.

1249

1261

6. P. 3-200: Where are all these sites plotted? We need to see a map! Also, when you base projected densities on inventoried Air Force land you are dealing with a very disturbed area of land and therefore these projections may be very skewed against the actual density. You cannot assume that you will find similar densities in much more undisturbed areas of land. How will you address this?

1262

7. This DEIS constantly reiterates that the Air Force has no real plan to deal with the cultural resources in the impacted areas. It appears that sites are definitely going to be destroyed and qualified archeologists have not and will not be able to assess their significance. Federal legislation 1263 obliges us to protect this resource--your lack of information and apparent lack of measure of projections based on minimal data is of great concern to archeologists in the area. How do you propose to implement a more rigorous plan for the protection of such resources?

8. P. 3-200, 3.1.12.4.1.1: When you state that "currently available information does not permit identification of specific resource sites subject to such impacts....", how can it be valid to discuss overall impact on the resource, 1248 even on a "generic" scope. I thought the purpose of a DEIS was to identify and evaluate impact. This apparently has not been done. How and when will it be done?

9. P. 3-201. "A recently completed archaeological inventory of selected portions of the base recorded eight prehistoric sites within a relatively small area..." 1262 How does this affect your predictions for site density? Based on this small study, the site density should be fairly dense. How will you deal with the 1275 large amount of cultural resources that you will undoubtedly encounter? More importantly, how is the public to assess the manner in which you plan to treat these resources since it is not stated specifically in the DEIS (an impossibility since you do not even know the extent and nature of the resource in the area).

1264 10. Who is funding the archeological work in the area? Who is ultimately responsible for its protection and/or mitigation?

1265

11. Who do you plan to contract to do the cultural resource work still required in the area? What are their qualifications in this cultural area? What professionals do you plan to engage to oversee mitigative measures and what 1266 are their qualifications?

Thank you for your time. We will await your reply.

Sincerely,

Kathie Joyner
Professional Archeologist
David J. McGuire
David J. McGuire
Professional Archeologist

enclosures

2) Will baseline conditions identified for existing or expected resources be affected by the Proposed Action?

3) Have these resources been determined to have important scientific or humanistic qualities?

4) Is the loss or gain of information or value, if any, resulting from project-related activities expected to be: a) minimal, b) limited, or c) extensive?

Answers to the above questions may be derived from currently available information or reasoned extrapolation from baseline data. In addition, these criteria are in accord with those promulgated in existing statutory guidelines (e.g., 36 CFR 800 and 36 CFR 60).

The level of impact associated with any element of Cultural or Paleontological Resources is established according to the following qualitative rankings:

- o Negligible impact:
  - Where the response to questions 1, 2, 3, and 4 is no;
  - Where the response to question 1 is yes and the response to questions 2, 3, and 4 is no; or
  - Where the response to questions 1 and 2 is yes and the response to questions 3 and 4 is no.
- o Low impact - Where the response to questions 1, 2, 3, and 4(a) is yes.
- o Moderate impact - Where the response to questions 1, 2, 3, and 4(b) is yes; and
- o High impact - Where the response to questions 1, 2, 3, and 4(c) is yes.

It should be apparent from the material presented above that the determination of level of impact as defined here entails a linked evaluative process. The key elements in the proposed procedure for level of impact determinations are the specification of criteria 3 and 4. Depending upon characterizations of the degree of loss or gain of scientific and humanistic values to particular resources, level of impact will be ranked negligible, low, moderate, or high.

Comment #4

Due to the current lack of a comprehensive resource inventory within the Region of Influence and Area of Concentrated Study, it is not possible at this time to identify all properties that will be affected by project-related activities. Similarly, it is impossible to determine in advance the exact nature and spatial extent of such anticipated impacts. Consequently, estimation of the degree of expected loss or gain of important scientific or humanistic qualities at a given resource

Comment #4

locality must be based almost exclusively on professional judgment. As further data to predict the precise numbers, kinds, and conditions of resources subject to direct or indirect project effects become available, level of impact determinations will become increasingly more objective and resultant assessments will be incorporated into the resource management process.

In addition to considering level of impact, predictions of project-related impacts on cultural and paleontological resources involve evaluating the type, duration, and scope of impacts to each major resource element and subelement. For both cultural and paleontological resources, impacts might be either direct or indirect. Direct impacts result from disturbances occurring during project planning, design, construction, and operation that result in modifications to the landscape. Indirect impacts are those induced by, but not directly the product of, project planning, construction, and operation. For example, induced development and increased usage of public recreation facilities will likely result in impacts to resources through related increases in vandalism, looting, and artifact collecting. The magnitude of indirect impacts generally is dependent upon the rate of population increase and the demographics of the resultant population.

Impacts may be classified as beneficial or adverse. Beneficial effects result in enhancement of the qualities of a resource that give it significance. These could include restoration of historic buildings for appropriate reuse or recovery of scientific data from archaeological sites that otherwise will be lost. Adverse impacts result in the loss or alteration of the qualities of a resource that give it scientific or humanistic value (cf., 36 CFR 800.3.)

Duration of impacts can be classified as short term or long term. Short-term impacts are direct or indirect effects occurring during the period of project construction when ground disturbance and population levels will be at their maximum. Long-term impacts consist of those direct or indirect effects occurring as a consequence of project operations.

Scope of impacts refers to the geographic area within which project-related effects are perceived or predicted. For purposes of the current analysis, three areal scales are recognized: 1) site, referring to the Area of Concentrated Study; 2) local, encompassing historic districts, parks, and cultural conservancies proximal to the project area; and 3) regional, constituting the remaining area included in the Region of Influence.

3.1.12.3 Determination of Significance Criteria

The significance of impacts to cultural and paleontological resources is a measure of the relative importance of the impact in terms of the quality of human existence. In this context and in accordance with 36 CFR 800.3 and 40 CRF 1508.27, significant impacts are those that have beneficial or adverse effects on those qualities that make a cultural resource eligible for the National Register of Historic Places. Similarly, significant impacts to paleontological resources are those that have beneficial or adverse effects on the scientific significance of the resource. Conversely, impacts that are not significant are those that have no effect on a Register-eligible property. Although any loss of humanistic or scientific values/integrity is inherently

detrimental to the resource base, the Air Force is required to assess adverse effects only for cultural resources that have been determined to be eligible to the National Register of Historic Places (36 CFR 60.6).

Air Force management policy for cultural resources stresses avoidance of adverse impacts. Nevertheless, it is assumed that, regardless of the best efforts during project planning and design, unavoidable adverse impacts to cultural and paleontological resources will result from its implementation. The degree to which this holds true is wholly dependent on the siting of specific project elements.

3.1.12.4 Environmental Impacts of the Proposed Action and Project Alternatives

Certain fundamental assumptions are incorporated into the analysis of direct and indirect impacts expected to result from project-related actions. These may be listed as follows:

Comment #5

- o It is assumed that existing resource inventory data, which probably represent less than 1 percent areal coverage of the Region of Influence, provide a reasonable approximation of the kinds of resources occurring throughout the area. ✓
- o It is assumed that currently unrecorded or unevaluated resources exist within the Region of Influence that possess important scientific and/or humanistic values.
- o It is assumed that ongoing natural and human factors affecting current baseline conditions (e.g., wind and water-prompted erosion or common agricultural practices) will remain relatively unchanged for the foreseeable future.
- o It is assumed that the Air Force will establish a program for resource management that complies with applicable federal and state laws and regulations. Such a comprehensive resource management plan will establish:
  - Methods for inventory of all cultural and paleontological resources potentially directly affected by proposed actions, ✓
  - Procedures for evaluating cultural resources for National Register of Historic Places eligibility in accordance with the criteria established in 36 CFR 60.6,
  - Measures for mitigation of adverse impacts to Register-eligible resources,
  - Procedures for monitoring and managing Register-eligible resources, and

Procedures for implementing and coordinating the measures listed above.

The analysis and specification of potential impacts to cultural and paleontological resources involved projecting known and anticipated project-induced landscape-altering processes onto existing baseline conditions and applying the criteria outlined in Sections 3.1.12.2 and 3.1.12.3 to establish level and significance of impacts. All recorded sites were plotted onto standard topographic sheets to provide a common basis from which to characterize resource dispersion information regarding the content, age, and environmental setting of all sites/localities for a given resource element were used to generate qualitative estimates of potential site densities for areas that currently lack direct resource inventory data. Both known and projected resource density estimates were then compared against the individual aspects of the Proposed Action (e.g., facilities construction at F.E. Warren AFB) to estimate the numbers and kinds of sites/localities potentially subject to direct or indirect project effects.

In the sections that follow, the results of these analyses are presented for both the No Action and Proposed Action and its alternatives. These analyses lead to the conclusion that the Proposed Action should have no significant adverse impacts to cultural and paleontological resources. In the case of American Indian and paleontological resources, this determination is based on an absence of any known sites or localities in areas subject to direct project impacts and the low likelihood of encountering such resources. Consequently, in accordance with 40 CFR 1501.7(a)(3), detailed consideration of impact analyses and results for these two resource elements is not included in this document; however, such an account is provided in the environmental planning technical report for the project. In the case of prehistoric and historic cultural resources, the determination of no significant adverse impacts is predicated on the assumption that a comprehensive resource management plan will be developed and implemented and that mitigation measures will be adopted to avoid or ameliorate potential adverse impacts to Register-eligible resources, which should allow the Air Force to seek and obtain a determination of "no adverse effect" from the Advisory Council on Historic Preservation in accordance with 36 CFR 800.

3.1.12.4.1 Prehistoric Cultural Resources

3.1.12.4.1.1 Baseline Future - No Action Alternative

Impacts to prehistoric cultural resources within the Region of Influence and Area of Concentrated Study occur from a variety of natural and manmade causes. Although most trends mentioned here will result in an overall loss of resource values, certain actions may have beneficial effects. At the same time, currently available information does not permit identification of specific resource sites subject to such impacts, and much of this narrative is necessarily generic in scope and content.

3-200

Perhaps the single most important impact to the existing resource base is ongoing natural erosion/decay that affects all physical properties exposed to the environment. This process is expected to continue into the future at a fairly uniform rate, and over the long term, will significantly diminish the scientific and/or humanistic value of the resource.

Both short and long-term degradation of the resource also will result from current and projected regional land use patterns. Housing construction, industrial and urban development, recreational use, agricultural practices, and the like all may contribute to the loss of heritage values. Population projections indicate that significant increases can be expected in the number of people inhabiting the region, and therefore, resource sites likely will be altered or destroyed at an increasing rate during the next few decades.

Ongoing and proposed construction of new facilities and modifications to existing structures at F.E. Warren AFB could cause adverse impacts to both known and unknown prehistoric resources. A recently completed archaeological inventory of selected portions of the base recorded eight prehistoric sites within a relatively small area; therefore, it is concluded that virtually any ground-disturbing activity has the potential for encountering additional prehistoric remains.

It is anticipated that existing federal, state, and local statutes affording protection to significant prehistoric resources will continue to be in force for the foreseeable future and even may be expanded in scope and authority. These protective measures may be viewed as a beneficial effect in that they serve to avert adverse impacts that would otherwise occur if no such measures existed. In this same respect, negotiations are currently underway to develop a Memorandum of Agreement between the Air Force, the Advisory Council on Historic Preservation, and the Wyoming State Historic Preservation Office that will provide for comprehensive management of all cultural resources at F.E. Warren AFB. The establishment of such an agreement, which is not contingent upon the Proposed Action, would require that heritage concerns are addressed in base planning efforts and this, in turn, would reduce the level of impact associated with future facilities siting and construction.

3.1.12.4.1.2 Proposed Action

Direct project-induced impacts potentially affecting important prehistoric cultural resources will occur as a result of several ground-disturbing activities required by the assembly, deployment, and operation of the Peacekeeper missile system. In the paragraphs that follow, these impacts are described for each major component of the Proposed Action.

Construction of support facilities at F.E. Warren AFB will result in low to moderate, short and long-term impacts to resources located in the immediate vicinity of proposed construction sites. Proposed onbase facilities construction will involve above-ground modifications to existing structures or new construction in areas that have witnessed prior disturbance, and negligible impacts are expected from these activities. On the other hand, construction of a new Stage Storage Area and proposed additions to the Weapons Storage Area will involve substantial

3-201

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11-15-83

Tim Kees
RR # 2 Box 77
Alliance Nebraska, 69301

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Dept. of Air Force
AFRCE - BMS
Norton Air Force Base, CA. 92409

Dear Major Walsh,

Thank you in advance for finding the DEIS report on deployment of MX missiles systems in minut-man silos in the wyo-braska area extrely lacking and without value. Please find listed below some objections and concerns on both the DEIS report and the proposed deployment plan in general.

Although I realize that you are not a true resident of this area, and once deployed I am sure you will not come within a thousand miles of this area, with this in mind I still ask you to consider the affects and effects this deployment would have on the Wyo- brask area and its denizens.

Grave concerns:

44 1) The Entire DEIS report is filled of generalalities no specific actions are
37 outlined.
2) The environmental impact of Soviet first strike on the silos themselves is not
163 addressed at all or the effects of life in the area after such a first strike.
3) Effects of accidents with MX missiles
4) Effects new security policies around deployment areas will have on the rights of
143 the citizens nearby.
5) The loss of nearly ten thousand dollars in the city of Kimball alone over the ten
414 year proposed period (3-38 & 3-40) DEIS
6) Are there hidden costs not mentioned?
7) Small businesse faldings because of new competion form corporate franchisee.
8) Inflation in the boom area and the bust following construction.
9) Transportation of missile and construction on already unstable roads.
10) The building of this system on a highly dangerous fault system
1471

I could go on and on.

Please for now.
Tim Kees

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TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-411

364

TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-461

365

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-316

366

Meriden, Wyoming 82081
November 22, 1983

Col. Walsh
AFRCE BME/Dev.
Norton AFB, CA 92409

Re: MX - Draft Environmental Impact Statement

Dear Col. Walsh:

Although I attended and presented testimony at the MX DEIS hearing in Pine Bluffs and Cheyenne, Wyoming, I would further add to the record the following:

1. The DEIS comment period of time was much too brief and should be lengthened.

23 The time problem for rural people was further exacerbated in that it presented unique problems in locating a copy of the DEIS at a library in the area or sending off to California for a copy. The time and energy, both in dollars and time away from work, for those in the outlying areas to get a copy of DEIS should at least be compensated by an extension in the comment period.

2. I object to the intimidating format which the Air Force set up for the public to address the MX DEIS. I would submit that fear of speaking in public for the average citizen was heightened by the physical setting and manner which the Air Force ran the DEIS hearing process. To truly have the greatest public input, in whatever form, should be the Air Force's primary goal, rather than styfling it (the public input).

16

3. MX DEIS should address Missile site and cable line restoration to original condition or better.

183 a. Should Congress at any point in the deployment process stop production funds for the MX,

b. When the MX has fulfilled its strategic purpose/ or

c. When the MX or Minuteman III missiles are outmoded.

179 The selling back of Missile sites to land owners in the area at a minimum price should be considered and addressed for future planning.

Thank you for your cooperation in this endeavor.

Linda L. Kirkbride

Linda L. Kirkbride

P.S. Adverse weather conditions may delay the delivery of this letter

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-337

368

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-339

369

Cattail Ranch, Inc.
Rodney Kirkbride

November 28, 1983

To: AFRCE-BMS/DEV attn: Major Peter Walsh
Norton AFB, California 92409
Subject: DEIS for Peacekeeper in Minuteman Silos
90th Strategic Missile Wing
F.E.Warren Air Force Base, Wyoming

Dear Sir,

With this letter I am responding to the invitation of the Air Force to comment on the Draft Environmental Impact Statement for the deployment of the MX missile system. I want it understood, however, that my response does not indicate that I in any way approve or condone the deployment of this system. I believe that the report of the Scowcroft made it very clear that is not a strategic necessity but was only a political compromise.

While I feel there are several deficiencies, I would like to comment on the following subjects.

1.6.3 There is no indication of the increase in size of the Launch facility, or the amount of land needed for construction facilities. In view of the fact that the transporter is some ten feet wide I wonder if a 24 foot roadway will be wide enough to accomodate oncoming traffic. **130**

1.6.10 While I am not privy to information contained in DoD Directive 5154.4-S and OSHA Standard 1910.109, the information included in the DEIS concerning saftey on rural roads during transport of the propellant stages. Will there be a 1750 or 1050 foot saftey zone or will that be waived under public pressure as indicated by an Air Force spokesman? Also not addressed was the prospect of hazardous driving conditions due to dust during the construction phase. **190** **1008**

Little Bear Rte. Box 41 • 3640 Rd 132 • Cheyenne, WY 82001 • Telephone — Albin 246-3363

Cattail Ranch, Inc.
Rodney Kirkbride

2.1.1 (or other) I could not find any indication of the impact of this project on the health of the agricultural industry. The impact would include employment difficulties both because of higher wages and the need for more employees to monitor the activities of construction employees and others on our land. Also no reference was made to the disruption of travel to and from the workplace and marketplace. It would also include the difficult in obtaining supplies necessary for the smooth operation of a business. As a veteran of the Minuteman deployment period I can remember all the harrasment it caused us. Not only were we inconvenienced but we had our very lives jeopardized by the lax saafety precautions practiced by the contractors. We do not to have to repeat that experience. **423** **141**

2.1.9 There do not seem to be any references to the possibility of mineral and petroleum exploration and exploitation and what restrictions might be imposed. **1457**

2.1.6 According to the DEIS there would be little or no impact on availability of REA power or telephone systems. I suspect that if the REA is required to supply more power they would have to buy more expensive power from another supplier which would be a hardship on the present users. Already there are subscribers to the telephone system in the Albin area who would like to upgrade their services but cannot because of lack of capacity on the existing equipment. There are also times when there is no long distance service from Albin to Cheyenne because the trunk line is filled. **887**

2.1.11 There have been times in the past when everyone in the county thought our private land was their recreation area. As rural landowners we value our privacy and do not look favorably on an influx of uninvited guests doing, Lord knows what, to the land and buildings. **1168**

2.2 The discussion

Little Bear Rte. Box 41 • 3640 Rd 132 • Cheyenne, WY 82001 • Telephone — Albin 246-3363

Cattail Ranch, Inc.
Rodney Kirkbride

2.2.3 The information in the DEIS concerning paleontology was not clear but it is my perception that paleiontological resources were not considered significant. That may be due to the fact that there has been relativ ely little exploration in this area. I find that I can go almost anywhere along Horse Creek and to the high ridges both north and south and find fossils. I don't know the formations but that closest to Horse Creek is a layer of volcanic ash. **1271**

I hope my concerns will encourage you to look a little more closely so the impact on my part of the country.

Yours very truly,

Mrs. Rodney Kirkbride

Little Bear Rte. Box 41 • 3640 Rd 132 • Cheyenne, WY 82001 • Telephone — Albin 246-3363

370

TESTIMONY FROM

WHEATLAND, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-390

371

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-380

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TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-316

373

November 19, 1983
3171 Green Valley Rd
Cheyenne, Wy 82001

Major Peter Nash, Director, Environmental Planning Division
AFSCE B49/270
Norton AFB, Ca. 92409

Dear Sir:

Thank you for my copy of the Draft Environmental Impact Statement (DEIS) for Peacekeeper in Minuteman silos. I should like to offer the following proposals and additions to your statement for your consideration.

118 The Air Force has been directed by the President and the Congress to deploy 100 MX missiles in the vulnerable Minuteman silos in Wyoming and Nebraska although by a slender margin of only 9 votes in the House. This support could evaporate after or even before the 1984 elections, and this or a new administration and Congress could reverse themselves and cancel the present project before the missiles could be put in the ground, as people become more and more opposed to the increasing militarism of the Reagan administration and the Congress.

37 An environmental impact statement, as the title suggests, should be a statement under which the larger issues are considered, such as the impact of nuclear war on the nation and the world community. It should not be limited to just the technical details of installation. It should be a decision making

76 document with two purposes; First, to propose alternatives to the proposed action which would base the MX missiles in vulnerable Minuteman silos, and,

15 provide for public review permitting the city, county, other agencies, organizations and individuals to voice their concerns with regard to the impacts arising from installation.

116 People have a right to know if it is still the objective of this administration to initiate a nuclear war with these first strike weapons?

2.

To my knowledge, the President has never retracted his assertion that we could win a nuclear war, to which the Pentagon has concurred in writing, although admitting it would be at a horrendous cost of one hundred fifty million casualties.

Those in support of our military program say that our deterrence system has
116 been successful for 30 years, and could go on being effective forever. But even Reagan has expressed doubts that this could continue, and his insistence on building the most gigantic arms program in the next ten years does not indicate a feeling of security.

One would assure that the Air Force would pay all or a percentage of the cost of the roads, schools, water, sewage and other capital improvements necessitated by project impacts. On the contrary, you state in the DEIS that local and State agencies should finance such needs by grant funding, increased fees and license charges, increased mill levies, increasing the number of students per classroom, and by increasing bonded indebtedness to fund facility expansion. Nowhere in your statement do I find a willingness for the Air Force to contribute its share of such costs. Local citizens will therefore be required to pay federal
87 taxes on the billions of dollars the project will cost, estimated at over $400 a person, but apparently you also expect the local citizen to finance the above modifications in addition.

If Wyoming's congressmen are unable to protect its citizens from this unequal impact, I can only appeal to the Air Force to assure its fair share of the cost of roads, and other capital improvements and services when the MX project is the principal beneficiary.

We have relied on our politicians to resolve this threat, and they have
104 totally failed us. While we reject offers by the Soviets for a nuclear freeze, and first use, a test ban treaty, and an end of all future production, Congress rids our fuel to the fire by passing a 249 billion dollar defence appropriation bill which would fund every major weapons system on the President's list.

3.

To come to grips with our terrible dilemma, we must realize that nuclear war is preventable, we can keep it from happening.

But the citizens of the United States cannot leave their fate in the hands
104 of the politicians any longer. As more and more people learn the facts about nuclear war, they are becoming more involved, and they are beginning to voice a massive outcry against nuclear war, so strong that it cannot be ignored.

The Air Force should look forward to reorganizing its programs.

With best regards,

Louis Leichtweis

Louis Leichtweis

374

Marian Lensen
Rt 1, Box 56
Sidney, Ne 69162

Nov. 4, 1983
DEIS Meeting
Kimball, Ne.

104 MY NAME IS MARIAN LENSEN. I LIVE ON A FARM IN CHEYENNE, COUNTY NEBRASKA NEAR SIDNEY. I ACKNOWLEDGE THAT AIR FORCE PERSONNEL ARE DOING THEIR DUTY IN PROMOTING AND SELLING THE MX MISSILE. I ALSO AM DOING MY DUTY AS A PATRIOTIC AMERICAN WHEN I FIGHT THE BUILDING AND DEPLOYMENT OF THE MX MISSILE BECAUSE MY CONSCIENCE AND MY INTELLECT, AND MY INSTINCTS DEMAND IT.

JUST BECAUSE THE SCOWCROFT COMMITTEE, COMPOSED OF LIKE MINDED OLD MEN WHO HAVE SUPPORTED THE MX FROM THE TIME OF ITS INCEPTION, RECOMMENDED PLACING 100 MX MISSILES IN EXISTING MINUTEMAN SILOS: AND PRESIDENT REAGAN RUBBER STAMPED THEIR SUGGESTION: AND BECAUSE CONGRESS HAS REMONSTRATED, BY A HOUSE VOTE OF 247 to 206 , APPROVED FUNDING FOR 21 MX MISSILES, ALL THAT DOESN'T MEAN THAT THE LAST WORD HAS BEEN SAID ON THE MX. ALL THAT HAS BEEN PROVEN SO FAR IS THAT IN WASHINGTON D.C. THE EMPEROR HAS NO CLOTHES.

232 ACCORDING TO THE DEIS (PAGE 2-1) THE REGION OF INFLUENCE IS DELINEATED ON THE BASIS OF A 60 MILE RADIUS SURROUNDING F.E. WARREN AIR FORCE BASE. IT WAS STRETCHED TO INCLUDE THE DENVER METROPOLITAN AREA, BUT STOPS AT THE CHEYENNE COUNTY, NEBRASKA LINE. THAT SEEMS AN ARBITRARY LINE TO DRAW.

LENSEN

"2

SIDNEY IS ONLY 40 MILES EAST OF KIMBALL. YOU ARE EXPECTING MORE IMMIGRANT WORKERS THEN THERE WILL BE JOBS FOR. I BELIEVE THAT SOME OF THOSE SEEKING JOBS WILL SPILL OVER INTO THE
232 CHEYENNE COUNTY AREA. MANY WILL BE PRACTICALLY DESTITUTE, FROM THE EFFECTS OF REAGANOMICS. AMERICA'S NEW POOR. GOOD HARD WORKING PEOPLE OUT OF WORK THROUGH NO FAULT OF THEIR OWN, BUT NEVERTHELESS, NEEDING FOOD, SHELTER, CLOTHING, MEDICAL CARE, PUTTING A STRAIN ON CHEYENNE COUNTY RESOURSES.

DEIS CHART PAGE # 3 - 21 REGIONAL PER CAPITA INCOME (1982)$

The PERCAPITA INCOME OF THE REGION OF INFLUENCE IS PROJECTED WITH AND WITH THE MX. ACCORDING TO THE CHART, THE PER CAPITA INCOME WITH THE MX INCREASES VERY LITTLE OVER WHAT IT WOULD BE WITHOUT THE MX.

IN 1984 THE PERCAPITA INCOME GOES UP BY $6 DOLLRS.
IN 1985 BY $ 50, AND THAT'S THE LARGEST AMOUNT FOR ANY YEAR.
IN 1986 BY $ 7.00
438 IN 1987 BY $26.00
In 1988 BY$ 19.00
In 1989 BY $ 8.00
IN 1990 BY $ 0 .00
IN 1991 BY $0 dollars.

From THIS CHART IT WOULD APPEAR THAT THE ECONOMIC BOOM WON'T BE GREAT IF SPREAD EVENLY AROUND. BUT IT WON'T BE SPREAD EVENLY. SOME WILL PROSPER, SOME WILL PAY. THOSE WHO WILL PAY THE MOST ARE THOSE LEAST ABLE TO FEND FOR THEMSELVES. LOCAL INFLATION WILL HIT HARDEST THOSE ON FIXED INCOMES, THE ELDERLY
467 AND THE DISABLED. THEREFORE THE SAME PEOPLE WHO REQUIRE THE MOST MEDICAL CARE AND THEY WILL FIND IT HARDER TO GET BE CAUSE THERE WILL BE MORE PEOPLE AND THE SAME NUMBER OF DOCTORS AS TODAY.

LENZEN 3

THAT SEEMS TO BE THE AMERICAN WAY. THE EXPLOITER IS ADMIRED: THE EXPLOITED ARE IGNORED.

FARM FAMILIES WILL PAY OUT OF ALL PROPORTION TO THEIR NUMBERS. NINE, AS OF NOW, AND THE DEIS SAYS THAT NUMBER IS " CONSERVATIVE" MEANING THE NUMBER COULD INCREASE DRAMATICALLY, WILL HAVE TO MOVE OR LIVE IN THE RESTRICTED SAFETY ZONE SURROUNDING THE MX.

185 I DON'T LIKE TO LIVE WITHIN 50 MILES OF AN MX. I CAN'T IMAGINE ANYONE OPTING TO STAY BUT MOVING WILL BE A STRESSFUL EXPERIENCE. AIR FORCE PERSONNEL ARE USED TO BE TRANSFERRED EVERY THREE YEARS. BUT FARM FAMILIES ARE NOT NOMADS. MANY FARM FAMILIES LIVE ON THE SAME LAND HOMESTEADED BY GREAT GRANDPARENTS. THEIR ROOTS ARE DEEP, MOVING WILL NOT BE EASY.

A RECENT STUDY SHOWED THE MX WILL COST EVERY AMERICAN FAMILY OVER $400 DOLLARS AND THE NATION AS A WHOLE 385,000 jobs.

117 THAT IS A BIG PRICE FOR A WEAPON SYSTEM THAT WILL REPRESENT ONLY 5 to 11 PERCENT OF THE U.S. NUCLEAR ARSENAL WHEN IT IS COMPLETED IN 1989. THAT $27.6 BILLION WOULD BE BEST KEPT IN FAMILY POCKET BOOKS.

THE MX WILL MAKE THE ENTIRE TRI-STATE AREA GROUND ZERO: THE NUMBER 1 TARGET IN THE U.S.A. THE NEED FOR THE MX WAS REFUTED BY THE DECISION TO PLACE IT IN EXISTING VULNERABLE SILOS. IT IS ALL SHOW AND TELL. THE MX IS VOODOO DEFENSE TO GO ALONG

104 WITH VOODOO ECONOMICS. IT WOULD DO AS MUCH GOOD [redacted] TO STICK PINS IN AN ANDROPOV DOLL. I'll keep my fingers crossed + hope + pray that the U.S. arsenal Reagan

WASHINGTON MACHO MANIACS ARE WILLING TO PLAY CHICKEN GOING WITH THE FATE OF THE EARTH HANGING IN THE BALANCE AND THEY MAKE AREA RESIDENTS HOSTAGE SPECTATORS TO THEIR MADNESS.

LENZEN 4

IF THE MX MUST COME, THEN ALL POSSIBLE SECURITY MEASURES MUST BE TAKEN. DON'T FALL BACK ON YOUR PREVIOUS SAFE RECORD, BECAUSE THAT WON'T MEAN A THING IF AN MX MISSILE HAS AN ACCIDENT. THAT WOULD GIVE NEW MEANING TO BOOM AND BUST.

144 LAUNCH CONTROLL FACILITES HAVE SIX SECURITY GUARDS. IS THAT ENOUGH IN LIGHT OF THE TERRORIST ATTACK IN LEBANON THAT KILLED 0 230 US. MARINES. THEY DIDN'T EXPECT AN ATTACK, NEITHER DO YOU, BUT IT COULD HAPPEN. TERRORISM IS ON THE INCREASE!

PLACING AN MX MISSILE IN AN ACTIVE EARTHQUAKE FABLT ZONE

174 IS RESKY. THE PEOPLE OF IDAHO DIDN'T EXPECT AN EARTHQUAKE EITHER.

AIR FORCE PERSONNEL WHO HAVE ACCESS TO NUCLEAR WEAPONS STORAGE SITES ARE EVALUATED UNDER A PROGRAM CALLED THE PERSONNEL RELIABILITY PROGRAM. THAT'S GOOD BUT NOT GOOD ENOUGH. MANY ARE WASHED OUT LATER, AFTER PASSING THE TEST, DUE TO ALCOHOL OR DRUG ABUSE OR TO SIGNIFICANT PSYCHICAL OR MENTAL CHARACTER TRAITS OR ABERRENT BEHARIOR. THE PENTAGON, IN 1980

105 FOUND THAT NEARLY HALF OF ITS JUNIOR ENLISTED MEN HAD SMOKED POT IN THE PREVIOUS 12 MONTHS AND MORE THEN A THIRD HAD LIT UP IN THE LAST MONTH.

WHEN A JET CRASHED INTO THE U.S.S. NIMITZ IN MAY 1981 KILLING 14 AND INJURING 42, SIX OF THE DEAD HAD TRACES OF MARIQUANA IN THEIR BLOOD.

THE DEIS SAYS THE MX MISSILE WILL BE MOVED DURING DAY LIGHT HOURS WITH AN ARMED ESCORT. I SUGGEST THAT MAINTENENCE

142 OF THE MX AND MINUTEMAN ALSO BE DONE DURING DAYLIGHT HOURS.

LENZEN 6 5

142

Statistics PROVE THAT MOST ACCIDENTS HAPPEN AFTER DARK.

154 ON PAGE 1-31 THE DEIS TELLS US WHAT COULD CAUSE AN EXPLOSION IN AN MX SILO. " POTENTIAL SOURCES OF IGNITION ARE THERMAL, ELECTRICAL, OR SHOCK DEVICES. HIGHLY ABNORMAL CONDITIONS WITHIN AN MX SILO COULD LEAD TO MOTOR IGNITION, DEFLAGRATION, OR DETONATION." WHAT ABNORMAL CONDITIONS WOULD DO THIS? EARTHQUAKE? OR WHAT IF A TERRORIST PLANTED 5000 POUNDS OF DYNAMITE ON THE SILO?

168 P215 IF AN EXPLOSIVE COMPONENT OF AN MX DID DETONATE " CONSEQUENCES WOULD BE RESTRICTED TO AIRBLAST, FRAGMENTS AND POSSIBLY DISPERSAL OF PLUTONIUM PARTICLES INTO THE AIR. AIR BLAST AND FRAGMENTS COULD CAUSE CAUSALITIES AMONG WEAPONS PERSONNEL IN THE AREA." BUT THE PARAGRAPH NEVER TELLS THE CONSEQUENCES OF " DISPERSAL OF PLUTONIUM PARTICLES IN THE AIR." WHY DON'T YOU SPELL IT[illegible] OUT? THE DEIS DOES NOT EXPLAIN WHAT PLUTONIUM IS OR HOW DEADLY IT IS. IT IS NOT LISTED IN THE GLOSSARY OF TERMS. I THINK IT SHOULD BE. MANY PEOPLE DON'T KNOW HOW LITTLE IT TAKES TO KILL.

DEIS PAGE 1-36 TELLS US THE STAGE FOUR PROPELLANT TANK WOULD CONTAIN 85 GALLONS OF LIQUID FUEL. IT SAYS THE ONE POSSIBILITY OF AN ACCIDENT INVOLVING TOXICS WOULD BE THE PUNCTURE OF THE SEALED CONTAINERS OF STAGE FOUR WHICH CONTAIN N_2O_2 and MMH.

MMH IS A VOLATILE CAUSTIC LIQUID WHEEN CAN CAUSE TOXIC REACTION BY INHALATION OR ABSORPTION THROUGH THE SKIN. THE MATERIAL PRODUCES RESPIRATORY IRRATION AS WELL AS SYSTEMATIC CENTRAL NERVOUS SYSTEN EFFECTS." ACCORDING TO THE DEIS.

LENZEN 6

EFFECT

THE DEIS GOES ON TO EXPLAIN WHAT OTHER SUBSTANCES IN THE FUEL COULD HAVE ON HUMANS. SUCH AS SEVERE BURN ON CONTACT VERY TOXIC WHEN INHALED: AND SAYS ONE PARTICLAR SUBSTANCE,

168 WITH A MILE LONG NAME WHAT I WON'T ATTEMPT TO SAY, "IS A PARTICULARLY TOXIC SUBSTANCE AND WERE A LEAK TO OCCUR, EXTREME CARE WOULD HAVE TO BE TAKEN. WHAT DOES THAT PARTICULALY TOXIC SUBSTANCE DO TO HUMANS? WHAT EXTREME CARE - ? TELL US.

I BRING ALL THIS UP BECUASE A TITAN MISSILE BLEW UP - IN THE MIDDLE OF THE MX NEAR GUY ARKANSAS A COUPLE YEARS AGO AND I BELIEVE SOME SERVICE MEAN WERE KILLED IN THAT MISHAP. IT WAS CAUSED BY AN AIRMAN DROPPING A WRENCH WHICH RUPTURED A FUEL TANK, WHICH BLEW THE LID OFF THE SILO AND ALSO THE NUCLEAR WAR HEAD AND RELEASED A TOXIC SUBSTANCE INTO THE AIR, WHICH CAUSED PEOPLE IN THE SURROUNDING AREA TO BECOME ILL. PEOPLE WERE EVACUATED FROM THE AREA, BUT THE CIVELIANS DIDN'T HAVE

155 GAS MASKS TO WEAR, AS THE AIR FORCE DID. JUST RECENTLY I READ A SMALL ARTICLE IN THE PAPER SAYING THAT THE MAYOR OF GUY ARKANSAS RESIGNED DUE TO POOR HEALTH CAUSED BY THE TITAN MISSILE EXPLOSION. THE TITAN MISSILES ARE NOW BEING DISMANTLED.

THE DEIS DOESN'T INDICATE WHAT PLANS ARE IN PLACE TO PROTECT CIVILIANS IN THE MX AREA. SINCE THE HARRISBURG THREEMILE ISLAND INCIDENT, ALL NUCLEAR POWER PLANTS HAVE TO HAVE A WARNING SYSTEN IN PLACE TO WARN AREA RESIDENTS IN CASE OF ACCIDENT. MAYBE THE MX SHOULD HAVE SUCH A WARNING SYSTEN.

LEHREN & 7

155 The minuteman safety record is good, BUT DON'T REST ON THE PAST.
I HAVE NO FAITH IN FAIL SAFE SYSTEMS. THREE MILE ISLAND
COULDN'T HAPPEN, BUT IT DID. KOREAN FLIGHT 007 HAD THREE
SEPERATE NAVIGATIONAL SYSTEMSTO KEEP IT ON COURSE, BUT IT STRAYED.
HACKERS HAVE GAINED ACCESS TO SENSITIVE DEFENSE DEPT COMPUTERS.

139 AIR FORCE PERSONNEL ACT AS THOUGH THIS LAND IS THEIR LAND,
FORGETTING THAT IT IS ALSO OUR LAND. PARKING AN ARMORED CARRIER
IN THE MIDDLE OF THE ROAD, AT NIGHT , WITHOUT LIGHTS OR WARNING
DEVICES IS ARROGANT. EVEN IF THEY WERE HAVING AN HE DRILL.
IN THE SUMMER OF 82 I ALMOST FLATTENED SOME AIR FORCE
MEN. I CAME OVER A HILL, ON A COUNTRY ROAD, AND THERE THEY
WERE, ALL OVER THE ROAD. THEY TOO WERE PLAYING WAR GAMES.
SOME HAD THEIR HANDS ON TOP OF THEIR HEADS. SOME WERE IN
CHARGE OF THE PRISONERS, SOME WERE IN THE FIELDS. BUT I
HAD NO WARNING THAT THEY WERE PLAYING ON THE ROAD AGAIN "
AND I CAME CLOSE TO HITTING THEM. I WAS RELIEVED WHEN I STOPPED
MY CAR INTIME. LATER I WAS ANGRY. AND I'M STILL ANGRY.
THOSE ROADS ARE FOR MY USE, JUST AS MUCH AS THEY ARE FOR AIR
FORCE USE. FOREBEARANCE BY AREA RESIDENTS HAS CONTRIBUTED TO AF SAFETY RECORD.

37 LAST, BUT NOT LEAST, I OBJECT TO THE REASON GIVEN IN THE
DEIS AS TO WHY THE IMPACT OF A NUCLEAR ATTACK ON THE MX WASN'T
MADE. BECAUSE THE EFFECTS OF NUCLEAR WAR ARE SPECULATIVE.
THE EFFECTS OF NUCLEAR WARHAVE BEEN DOCUMENTED, AND
DESCRIBED . HIROSHIMA HAPPENED. NAGASAKI HAPPENED. NUCLEAR
TESTS WERE MADE ON PACIFIC ISLANDS AND THE RESULTS DOCUMENTED.
THE OFFICE OF TECHNOLOGY ASSESSMENT HAS REPORTED ON THE EFFECTS
OF NUCLEAR WAR. MANY BOOKS HAVE BEEN WRITTEN ON THE SUBJECT.
YET THE DEIS SAYS THE EFFECTS ARE SPECULATIVE. NONSENSE.

LEHREN 8

what is speculative, is the accuracy of the mx . NO MISSILE
HAS BEEN FIRED OVER THE NORTH POLE AT A TARGET. NO ONE KNOWS
FOR SURE HOW ACCURATE THESE WILL BE. THAT IS SPECULATION.
EXPENSIVE SPECULATION AS THAT. THE PENTAGON, NEVER LIKES
TO TALK ABOUT WHAT THESE AWESOME WEAPONS WILL DO. IF THE
PUBLIC WOKE UP TO THE FACT THAT WE CANNOT SAVE DEMOCRACY BY
DESTROYING IT, THE PUBLIC WOULD DEMAND A HALT TO THE BUILDING
AND DEPLOYING OF MORE NUCLEAR WEAPONS.

375

TESTIMONY FROM
KIMBALL, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-453

376

TESTIMONY FROM
KIMBALL, NEBRASKA
PUBLIC HEARING

REFER TO
PAGE 6.2-456

377

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-313

378

TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-315

379

I will try to keep my comments relative to DEIS namely the land and the water. First of all, 6 weeks ago at the MX Town Hall in Laramie, the Air Force told us that the silo area would increase by some yards so as to accomodate the larger transport vehicles. And that the roads would have to be widened some, too. What the Force didn't tell us was that peoples homes would have to be either sold, bought or relocated. At any rate, the government is forcing people off of their land.

185 who do you think you are?

And now we're being told that the city of Cheyenne is going to foot the bill for the MX construction water project?

199 what gives? Cheyenne has enough problems with water acquisition and rights. Will Cheyenne receive any of the water as it sees fit?

And to quickly address the issue of endangered species - I suggest we first start with the top of this list. The government is taking peoples land and isolating the water supplies from those who need it most. The government has also disregarded the democratic process in trying to incorporate MX in Wyoming until it has yet to show us how MX will increase our security. The taxpaying citizens of this country are being ripped off by the Department of

50

104

OVER ⇒

Laramie and their kinds in the area industrial manufacturing business.

Is MX so display & will it keep the Soviets from moving a tank? Is it going to keep Russia from deteriorating in our future again?

104 MX — how already more developed would it have kept Russia from their current problems? We the MX haven't we friends & in Europe from being blown away?

I urge you all to seriously weigh your decision and accept the futility and unacceptable danger of proceeding with MX.

Joseph P Mancuso

Frank P Mancuso

Laramie

380

Nov. 2, 1983
Michael Mancuso
619 E. Plum ST.
Fort Collins, CO. 80524

Dear Sirs:

This letter is an exercise of my right to submit comment pertaining to the environmental impact statement of the 'Peacekeeper' missile deployment.

I believe the draft environmental impact statement is extremely deficient by not considering the 'impact' of the area being a prime target from adversary nuclear attack. It would be hard to argue that the area surrounding Warren A.F.B. will not be a very prime target in the event of nuclear war. And as I live approximately 40 miles south of Warren A.F.B. I have a special concern regarding this matter. The DEIS states

37 that this matter is not looked at because of its speculative nature. I believe this 'impact' to be to wide ranging, destructive, adverse and important to be overlooked for any reason. While the exact nature of the 'impact' might be somewhat speculative, an approximate knowledge can and should be mentioned. To not address this crucial aspect, which possibly can greatly overshadow any environmental impact due to the construction and deployment of the 'Peacekeeper' is an unfortunate oversight. It is my sincere hope that the final environmental statement corrects this deficiency, thus including a section in the report that pays due respect to this 'impact'. I know I am not alone on this feeling.

An E.I.S. should be unbiased in its report. 37
The inclusion of 'impact' of the 'Peacekeeper' concerning the effects of war might produce some "ugly" numbers, therefore adding argument against deployment of these advanced missiles. So be it; The truth is more important, especially when the stakes are this high. The graveness of this issue should not be taken lightly.

Sincerely,

Michael Mancuso

381

Mary Lou Maruca
1825 Morton Dr.
Cheyenne, Wy 82002

November 27, 1983

DEIS - MX
AFRCE - BMB/DEV
Norton AFB, Ca 92409

I would like to take this time to commend you for the detailed information that went into the preparation of the DEIS in regard to the MX missile. It accomplished what you had set out for it to do; it overwhelmed the missile's opponents. With all that information presented in the particular format used, not too many people would have the time or the basic knowledge to question the word of the experts and the government.

104 It is not possible for me to give the Air Force credit at this time for the presentation made for the MX. That will most assuredly come at a later time. For now my impression of the representatives from the Air Force was of a group of puppets who were given a script to recite and a list of predetermined questions that they could respond to. There was no place within the script for dialog and certainly no meeting of the minds of the representatives of the government and the people of the Wyoming region has taken place.

I am truly amazed at anyone who can be so sure that he is right in a matter that affects us many. May God forgive us and have mercy on all of us if the wrong decision has been made.

Sincerely yours,

Mary Lou Maruca

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The youth and adults in Cheyenne are particularly vulnerable to the fear, powerlessness, anger, and ultimately psychological numbing as related to living with the threat of a nuclear war or accident. Not only are we exposed to the national emotional news about nuclear weapons, nuclear debates, and potential nuclear wars, the local news is full of MX-related activity in our back yards. The potential for being subjected to a nuclear accident is in our awareness, as is the fear of being Ground-Zero in a nuclear war.

I was gravely concerned when the DEIS on the MX, Fall 1983, did not address in detail what would be the psychological effects of living in the nuclear zone of Wyoming/Nebraska. At both of the Air Force MX Scoping Hearings, I asked the following questions, which I continue to ask:

40
1. How are you going to handle the possible psychological and social negative effects of living in the shadow of nuclear war?

2. What are your plans for handling the psychological and social devastation if a nuclear accident or direct hit to Wyoming/Nebraska occurs?

I will also add the question that I assumed you would reactively answer:

3. What are the psychological and social effects of living with the threat of a nuclear accident or being Ground Zero in a nuclear war?

You can not [illegible] underestimate the psychological trauma associated with fear, helplessness, despair, and psychological numbing about our future, especially when nuclear first-strike missiles are in our back yards. The following is a reference for a list of resources that discuss the psycho-social effects of nuclear war:

Page Two

In addition, the following is a list of possible ideas of ways to mitigate the psychological and social impact of the MX:

40

1. Training workshops for helping professionals (i.e. school counselors, ministers, mental health workers, doctors, nurses, psychologists, social workers) on how to handle the psychological effects of living with the threat of nuclear war, nuclear accident, and/or being at ground zero.
2. Community workshops to help adults, parents, and children to work with their feelings of despair, fear, powerlessness, and anger over the potential for a nuclear war, a nuclear accident, and/or being at ground zero.
3. Education for teachers and parents on how to help children learn about nuclear war and how to wage peace through the school, workshops, television, radio, and newspapers.
4. Help to psychologically empower community residents so they will not feel powerless, helpless, and, hence, become psychologically numbed to the threat of a nuclear accident or a nuclear war in their back yard.

Possible resources for these workshops:

Psychologists for Social Responsibility
Suite 216, 1841 Columbia Road, NW, Washington, D.C. 20009

Educators for Social Responsibility
639 Massachusetts Ave., Cambridge, MA 02139 (617-492-1764)

Parenting in the Nuclear Age
c/o 6501 Telegraph Avenue
Oakland, CA 94609

Trudy S. Marshall

Trudy S. Marshall, Ph.D.
Psychologist
118 W. 4th Ave
Cheyenne, Wy 82001

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TESTIMONY FROM

PINE BLUFFS, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-320

384

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-372

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TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-432

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TESTIMONY FROM

HARRISBURG, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-434

387

TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-374

388

JUDITH K. OLSON, PH.D.
CLINICAL PSYCHOLOGIST

November 28,1983

Major Peter Walsh
Director, Environmental Planning Division (DEV)
Dept. of Air Force
AFRCE-BMS
Norton Air Base, CA 92409

Dear Major Walsh:

I am considered that the "Peacekeeper in Minuteman Silos Draft Environmental Impact Statement" requires expansion to adequately assess current and future impact related needs associated with the construction of the MX system. I will focus my comments to the areas of human services and social well-being.

My experience in human services impact mitigation suggests the following:

562 1. A human services planning body that will integrate preventive, informal, and formal service approaches to impact related needs should be implemented.

563 2. The needs assessment and monitoring system recommended in the draft EIS should be implemented, providing a data base for ongoing comprehensive planning to the above group.

3. Recognition that current shortfalls (staff, facilities, and programs) exist in the human service delivery system and that agency planning cycles are not responsive to fast changing impact related needs. Current needs must be met and the planning body must have the flexibility and resources to address rapidly changing conditions.

4. Mitigation needs may be anticipated in the areas of substance abuse, family problems, and youth problems. Initial mitigation plans should include preventive, informal, and formal service programs in these areas.

564 5. Because many of the needs generated by deployment of the MX missile system may indeed be short term in nature they will require innovative approaches to their solution. Predictable needs, however, cannot be ignored on the presumption that they will dissipate with the conclusion of the construction phase of the project.

I hope these comments are helpful to the preparation of the final report and the development of an effective mitigation program.

Sincerely,

Judith K. Olson, Ph.D.

319 So. Fifth St.

389

AFRCE
BMS/DEV
Norton AFB
California 92409

Nov. 28, 1983

Dear Sirs:

I want to go on record in opposition to the placement of the MX system in Wyoming. To echo the concerns of those residents of a low population state, a public land state, a state of ranchers and citizens earning a living from a wide open American landscape — the placement of MX there is not to be tolerated. The allocation of water, constraint of range, danger to residents, and influx of foreign workers to an established culture is not tolerable. My comments on not placing MX in Utah are totally related to the placement in Wyoming. Do consult these extensive comments in the Utah MX public record.

104

Margaret Pettis 1784 S. 600 E.
SLC, Utah 84105

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TESTIMONY FROM

TORRINGTON, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-418

391

28 Nov 83

TO: JAMES F. BOATRIGHT
Deputy Asst Sec of the
Air Force
Installations Environment and Safety
Washington, DC 20330

I am replying to your letter dated September 22, 1983 concerning the Draft environmental statement for the Peace Keeper Project (Formerly MX)

After reviewing volumes I, II, and III, Wyoming and Nebraska Socio-economic impact study (Sep 83), and the draft environmental impact statement (Oct 83).

I found that additional information should be included concerning the ethnic composition of the impacted area. As far as minorities is concerned, minority population, distribution, employment status, mobility, age group distribution and education completed in Scottsbluff County which is included in Peace Keeper Project. 12.5% is minority population. I suggest that information concerning
214 minorities in the impacted area should be more specific.

This information can be found in the 1980 census of population Vol I, characteristics of the population of State of Nebraska. Similar volumes for Wyoming and Colorado. I can make available this information if requested and assisting you in field work in the impacted area if such assistance is needed.

Mr Boatright currently I am working in the Peace Keeper Project as an independent consultant for a small minority construction company based in the State of Nev., which is interested in obtaining small construction contracts from Department of the Air Force to work in the implementation of the Peace Keeper Project.

This contruction company has been awarded construction contracts for the State of Nebraska in the past and has been involved in minority training Progrss for the City of Lincoln, Neb in conjunction with ACTA.

Mr Boatright I am seeking your advice to provide me with the proper documentation to bid for small construction contracts in the Peace Keeper Project (MX) Your assistance in this project would be greatly appreciated.

Sincerely:

VICTOR RIVAS
Tech Consultant

Please Reply to:
Victor Rivas
PO Box 9,96_
Lincoln, NE 6850_

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-469

November 15, 1983

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U. S. Air Force
AFRCE-BMS/DEU
Norton AFB, CA 92409

RE: Peacekeeper Impact Comments

Gentlemen:

After much thought and investigation, I believe the best idea brought forward to date for dealing with overall MX impact is a Mitigation Fund.

This fund would require an initia. ropriation from the U. S. Congress, in an amount to be determined .. a group of representatives who would ultimately comprise a Mitigation Board. This group should have representatives from the U. S. Air Force, U. S. Congress, States of Wyoming and Nebraska, Laramie County, City of Cheyenne, Laramie County School District #1, Laramie County Community College, the human and social service sector in the Cheyenne area, and the Cheyenne Chamber of Commerce.

Once the Fund and Board were established, all requests for Impact mitigation would be routed through the Board, where they would be screened to determine their appropriateness. Only documented financial impacts would be funded. Any money remaining in the Fund after
88 completion of the Bust Cycle would return to the U. S. Treasury.

This centralized mode of operation should be better and more cost effective for all the government and private entities involved in mitigation efforts than the more or less amorphous procedure now in place. Citizens and groups would know where to turn if impact related problems arise, and the federal government would know that they were only funding specifically documented impacts. We would also preclude the problem of having one agency overfunded while another is left out in the co

For this Mitigation Board and Fund to be successful, it is essenti that they be formed and funded immediately. This way impacts that do require front end financing can be handled in a timely manner.

Please consider this idea in analyzing strategies for coping with Peacekeeper deployment. I strongly urge its adoption and immediate implementation. I think it is a most reasonable and common sensical method of handling this problem, both from the perspectives of the U. S Air Force and the local governments and citizens.

Thank you for considering this comment. I would be glad to talk to you personally regarding this matter at your convenience.

Sincerely,

John Sandahl

John Sandahl
1503 West Wrangler Road
Cheyenne, WY 82009

Director, Environmental Planning Division (DEV)
Department of the Air Force, AFRCE-MAS
Norton Air Force Base, CA 92409
cc: Sen. Gary Hart, Sen. Bill Armstrong, Rep. Tim Wirth

To Whom It May Concern:

My primary objection to the Draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos is that access to it has been exceedingly difficult. The time for comments to the report was brief and limited. Distribution has also been limited and consequently so has access.

24 I had not heard about this DEIS except through non-government channels and this was only three weeks before the deadline for comments. Checking through the University of Colorado Library's government section turned up nothing. A request to the Air Force returned me a copy of the report, but I received it only one week before the comment deadline. I checked back at the University of Colorado Library, evidence (DEIS) in hand, to see if they had ever gotten a copy and after going through three reference librarians it turned out that Yes, they did. However, the DEIS was uncatalogued since there was no catalogue number on the book and they had not yet received the Denver Bulletin which lists cataloguing numbers for all government publications. I also learned from one of the librarians that

27 Teller, El Paso, Morgan, Washington, Phillips, Yuma, Lincoln and Kit Carson (p. 2-67). The region of influence for biological resources includes the Colorado counties of Routt, Jackson, Grand, Boulder, Gilpin, Jefferson, Adams, Denver, Morgan, Washington and Phillips (p. 2-1.5). The region of influence for geological resources includes the county of Morgan (p. 2-116). The region of influence for noise includes the counties of Adams and Denver (p. 4-125). The region of influence for air quality includes the county of Morgan (p. 2-113). None of the county clerks of the counties listed here received this DEIS. The only city clerk in Colorado to receive the DEIS was in Fort Collins. No Colorado state officials received this DEIS. No United States Congressmenpeople from Colorado received the DEIS. While Colorado State University and the University of Colorado did receive the DEIS, Denver University did not. No Colorado public libraries received this DEIS. While one Colorado nuclear freeze group received the DEIS (Common Cause of Colorado), there were a number of glaring omissions: Colorado Campaign for a nuclear weapons freeze, American Friends Service Committee of Colorado, Denver Nuclear Freeze Campaign, Boulder Freeze Campaign, Boulder Valley Friends Meeting, Loretto Disarmament/Economic Conversion Committee, National Association of Arms Control Veterans, Covenant Nuclear Disarmament Network, Center for the Study of Children and

DEIS's are generally shipped at the slowest and cheapest rate. I see nothing wrong with this, in and of itself, but when the comment period is so short, it might lead 24 one to believe that the Air Force has something to hide. I wonder how many people, equally interested but less determined than me, never saw a copy of this DEIS.

Both of the other DEIS's which I have previously commented on (Upper Rogers and Cheyenne National Forest) gave two month comment periods, both were extended in realization that more time would be needed 23 to receive a proper amount of public comment. It was during these extensions in which I made my comments, as I had not received notice of the DEIS's until past the deadline.

The following information is based on section 4.3 of the DEIS. Distribution of this DEIS is far from adequate. The focus of initial distribution was heavily centered on Nebraska and Wyoming. This is fine, but the DEIS should seek to ignore itself when the region of influence for transportation includes the 27 Colorado counties of Boulder, Adams, Jefferson, Denver, Arapahoe, Douglas and Elbert (p. 7-43). The region of influence for regional recreation includes the Colorado counties of Moffat, Routt, Jackson, Grand, Eagle, Summit, Pitkin, Lake, Park, Clear Creek, Gilpin, Boulder, Jefferson, Adams, Denver, Arapahoe, Douglas, Elbert,

Public Policy, Engineers for Technical Responsibility, Boulder Meeting of Friends, Women's International League for Peace and Freedom, Unitarian Universalist Social Action and Peace Network, Evergreen Freeze Campaign, Granny Nuclear Freeze Campaign, Montrose Nuclear Freeze Campaign, Arapahoe County Nuclear Freeze Campaign. This list is not complete. While the DEIS 27 states that it contacted several American Indian tribes regarding resource conflicts in the missile deployment area, finding that conflicts were possible, but not known, no DEIS was sent to the Northern Cheyenne, Shoshone, Comanche, Crow, Plains Apache, Kiowa, Arapaho 28 or Teton Sioux tribal councils, those that it had contacted.

Before commenting further, let me first state my objection to the term "Peacekeeper" for this nuclear missile system and why I will henceforth refer to it as "MX." The word in the 4 vocabulary was ideologically neutral. A great many were euphemisms. Such words, for instance as Defense (forces-laser cows) or Warfare (ministry of Peace, i.e., ministry of war) meant almost the exact opposite of what they appeared to mean." (p. 252) "From the above going account it will be seen that in response the expression of thoughtful opinions, above a very low level, was exceptionally impossible. It was of course possible to utter platitudes of a very crude kind, a series of reassurances. It would have been 104

possible, for example, to say all degrees is second. But this statement, which to an orthodox ear merely conveyed a self-evident absurdity, could not have been sustained by reasoned argument, because the necessary words were not available." (p. 254) Both quotes are from George Orwell's 1984. The term "Peacekeeper" is thus an attempt at quelling criticism by changing vocabulary. It is difficult to argue that a Peacekeeper is a weapon of war, but a missile is a weapon and a weapon, any weapon is a weapon of war.

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On page I-4 of the DEIS, it is stated that "the effects of war are speculative and lie beyond the scope of Peacekeeper (sic) deployment and peacetime operations. They are therefore not dealt with in this document." A restriction such as this is absurd, it would be as if a finely balanced axe were to be positioned above a log in its grip and debate on the action were limited only to positioning the axe and not to the consequences of the axe being spoken after positioning.

37

Section 3.1.3 of the DEIS discusses the social impact of installing ten cylinders of the size 71 feet long, 22 inches in diameter, weighing 195,000 pounds just below the surface of the earth. It does not discuss the psychological effects of installing nuclear missiles. A DEIS by omission indicates that there is no significant net effect on the local populace of living

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next to missile silos which are no doubt Soviet targets. There is a body of literature which indicates otherwise. It is apparent from the issues raised during scoping (p. D-1) that there is some sincere concern about 4X installation which might manifest itself in psychological disorders after installation.

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The responses (p. D-14) to issues identified during scoping regarding 4X system/policy issues (p. D-1) are shockingly brief and biased. There is no balance and consensus of opinion which is apparent throughout the rest of the DEIS regarding issues such as ecology, geology and sociology. Responses A-1 through A-6 and A-11 represent rephrasing of official administration policy and statement with no reasoning given, scientific or otherwise.

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Section F, "References Cited and Reviewed," lists exactly one reference to nuclear weapons, The History of the Minuteman Missile and Its Impact in Western Nebraska, by Tim Smith. There exists a wealth of literature on nuclear weapons and on the social and environmental aspects of nuclear weapons. The DEIS is by and large ignoring this information.

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"Eventually the survival of even the hardest targets would be doubtful in light of improved missile accuracy." (p. F-1) "These long-range R&D efforts, however, are independent of the actual deployment of

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Peacekeeper in Minuteman Silos." (p. D-15) These statements effectively discard without consideration the idea that protecting the missiles from attack is both necessary for their utility and for the protection of the local environment.

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Sincerely,

Thomas H. Slone

Thomas H. Slone
P.O. Box 7207
Boulder, CO 80306
(303) 444-9649
11/21/83

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TESTIMONY FROM

HARRISBURG, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-435

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1824 6th Avenue
Scottsbluff, NE 69361
November 21, 1983

Major Peter Walsh, Director
Environmental Planning Division (DEV)
Department of the Air Force
AFRCE - BMS
Norton Air Force Base, CA 92409

Dear Sir:

I am writing to comment on the Draft MX Environmental Impact Statement. I am disturbed by the fact that impacts are described in the DEIS they are described in the DEIS, they are described in general terms of "high", "moderate", and "low", with no special definition being given as to what these terms mean in relationship to the specific area discussed. No area has been set aside for discussion of the effects of possible accidents involving MX missiles, or of the effect of MX security procedures upon the rights of citizens and residents in the deployment areas.

Access roads for the land and its construction are encouraged in the Air Force right of the country. Why does the DEIS fail to meet many NEPA standards for the environmental impact statement process? Why were the Nebraska Department of Environmental Control and Nebraska Natural Resources Commission not consulted in preparing the Biological Resources analysis section of the DEIS? Also, the effect of contamination of water and wildlife by radioactive spills is not discussed in the DEIS. Hopefully, the MX missile or it is deployed, will never be used. But even if it is not, it must be dealt with. Failure to discuss potential contamination and conservation problems is a glaring omission of the DEIS.

I was alarmed to learn that there are two active geological fault systems in or near the deployment areas. The safety section of the DEIS admits that earthquake shock could be the cause of ignition within the silo. Why are the consequences of this not discussed in the DEIS? Why is there not an analysis of alternative deployment sites that are NOT on the fault line? Then given the most earthquake

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activity in Idaho, can the Air Force geologists have the audacity to consider that the likelihood of earthquakes occurring on the Wasatch-Absolon fault are remote. Given the unpredictability of earthquakes where none have occurred before, putting an MX missile on a geological fault strikes me as being just plain assinine!

The DEIS suggests that a new electrical substation will be built on the south side of Kimball, Nebraska. The Air Force has indicated that there will be a 15% increase in electrical consumption, but the DEIS says that the MX will increase consumption by only 1.3%. If that is true, why is a new substation needed? Who will pay for it? Who is going to use the other 13.7% of additional electricity? Who is paying for the increased electrical consumption by the MX?

I am very concerned about the effect of MX building activity on Nebraska's roads and highways. What will be the cost of improving and maintaining state and county roads during and after deployment, and who will bear these costs?

What restrictions will be placed upon citizens while the missile stages are being transported? What precautions will be followed by the Air Force when the missiles are being moved, and are there any new and ongoing restrictions that will be imposed once the missiles are in place? The Air Force has ruled the use impact on gravel roads as being "low and not significant." Not only am I unsure exactly what these words mean in real terms, I have great difficulty believing that such an assessment is accurate. Any increase of tonnage on rural roads (whose gravel surfaces are unusually delicate) is significant. Moving heavy equipment over such roads will destroy them in a hurry. No estimate is given in the DEIS regarding the time the general public will suffer delays and inconveniences due to road closure for maintenance and repair. Why is this not addressed? It sounds to be there will be much travel all the way to Washington if it isn't.

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As a resident of Scottsbluff, Nebraska, a town which borders the deployment areas in both Nebraska and Wyoming, I wonder why the DEIS doesn't address the impact that the MX deployment will have on the Scottsbluff-Gering area. For your information, Sir, the two cities mentioned are a major social and supply "hub" for both deployment areas. It contains a free health care facility, including a mental health center, a good shopping district, and recreational activities which rival, and, in most regards, far outshine those offered in Kimball or Sidney, Nebraska, or Torrington, Wyoming. Why have there been no projections of what MX deployment will mean for the community as regards use of social services, the general impact on social well-being as well as the economical impact? These questions need to be addressed. Scottsbluff and Gering will not be unaffected.

As I understand it, the Air Force's projection of 1750 feet as a safety zone around each silo is but an estimate. The exact size of the zone will not be known until testing is done in 1986. How many families will really be displaced? Will the Air Force guarantee that no additional land will be used or restricted as a result of MX deployment?

The safety zone from a silo to a public road is to be increased from 720 feet to 1050 feet. However, the Air Force admits that in some cases the 720 foot rule is not observed now, and anticipates that there will be exceptions made for the MX. Why, pray tell, do these safety zone rules exist if they are to be taken so lightly? What factors are taken into consideration in making such an exception?

Land will be needed for at least four new cable routes. How long will that farm/ranch land be out of production? How will maintenance procedures

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affect farm production, and for how long each year? Will the owners be compensated for the use of their land?

Finally, and perhaps most importantly, the DEIS fails to outline an appropriate monitoring program for the MX deployment. Even if all the comments and questions I have made are satisfactorily addressed in the final Environmental Impact Statement, without a monitoring program there will be no way to know whether or not a given standard is being violated, and therefore no way to hold the Air Force accountable for their actions and decisions during the deployment and maintenance of the MX missile.

These are my main concerns, Major Walsh. Given that the MX is to be placed in the heart of the food producing area of the nation, I do not think they are minor ones. I hope they will be addressed satisfactorily in the final Environmental Impact Statement.

Thank you for your gracious consideration of this letter.

Yours Truly,
Mary S. Spurgeon
Mary A. Spurgeon

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"WHEN WE GET to the point, as we one day will, when both sides know that in any outbreak of general hostilities, regardless of the element of surprise, destruction will be both reciprocal and complete, possibly we will have come enough to meet at the conference table with the understanding that the era of armaments has ended and the human race must conform its actions to the truth or die."

DWIGHT D. EISENHOWER
in a letter to Richard L. Simons of Simon & Schuster, publishers, in 1954

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-378

399

519 S. 6th St.
Laramie, WY 82070
November 15, 1983

AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Sirs:

87 I am writing to state my opposition to the Draft Environmental Impact Statement for deployment of MX missiles in Wyoming and Nebraska. I am a Wyoming citizen and my concerns against the DEIS include not only Wyoming and Nebraska, but the entire world. I attended the public hearings in Cheyenne and I sympathize with the residents of Cheyenne in their concern for not having or receiving enough money to handle the enormous impact that installation of the MX missile will cause.

37 But I feel the arguments over funding grossly miss the point of the issue. The deployment of MX missiles anywhere brings us a step closer to Nuclear War. The MX missile is not a deterrent weapon, it is a first strike weapon. The areas where the MX missiles are to be deployed will become first strike target sites. This seems to be an obvious fact that the DEIS conveniently neglects. By avoiding the issue of a planned Nuclear War or an accidental Nuclear War created by human or technical fallability, you are giving citizens of the impact area an unrealistic view of the permanent consequences of the MX missile.

Nuclear War is an environmental issue. I ask that the DEIS consider and include in its statement the impact of Nuclear War. This is its responsibility. The real impact issue of the MX missile is Nuclear War.

Thank you for the opportunity to express my views.

Sincerely,
Geri L. Stewart
Geri L. Stewart

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TESTIMONY FROM

KIMBALL, NEBRASKA

PUBLIC HEARING

REFER TO

PAGE 6.2-470

401

Re: Environmental Impact statement - MX

438 One of the major problems with DEIS as I view it, is the lack of depth concerning social well-being. Our current economic thrust has given us more millionaires and more unemployment. This thrust has widened a gap between people, rich and poor, the haves and have-nots. Our country has always had an economic "middle-class" to act as buffer between rich and poor, as mediator in the social arenas for both groups. Our current policy has cut into this group making some wealthy and some destitute. MX deployment, by design, furthers this gap and widens the disparity between these two groups. The Kimball and Laramie county people will see an increase in wealth for some, and an increase in unemployed. Broadening the gap between rich and poor, native and transient will only serve to polarize the existing situation. The DEIS does not adequately address this issue.

238 For example, under Mitigation measures 3.1.5.6 an information/coordination center that performs job referrals, social integration programs, and information distribution, under a public agency is to be formed. We are dealing with relatively unsophisticated people as concerns social change, for it will be a new and unique experience for many in this area. A more in-depth program should be outlined, i.e. who is the public agency - federal, state? Is a national or state advisor or advisors to be stationed in Kimball to assist with integration among farm, military and technical personalities? What private agencies will be assisting in this coordination? (Chamber of Commerce, Welcome Wagon, W.I.F.E., American Farm Bureau, Y.M.C.A., Church Councils, etc.)

The concerns here are multi-level. What is the government, the military and industry going to do about integration of their personnel into these communities? What are we as citizens of these areas going to do to implement the absorption of a diverse group of peoples into our area?

I hope we all take seriously the changes we are about to receive.

S. [illegible]

402

October 25, 1983

4533 Starr
Lincoln, Nebraska 68503

AFRCE-BMS/DEV
Norton AFB
CA 92409

Dear Air Force Officials:

At the briefing in Lincoln, Nebraska, the Air Force Officials publicly assured me that they would respond to the possible psychological impact of the proposed MX missiles in Nebraska. I have this exchange on tape and the World Herald referred to my testimony at this briefing meeting.

Your consultant firm from California called me and for an hour I gave evidence of the considerable psychological damage to our Nebraskan youth, which, in all probability, would occur. I cited studies and documentation both from within our State and from national studies.

40 Yet there is no mention of the psychological impact of the MX project in the entire Draft Environmental Impact Statement, Department of Air Force, PeaceKeeper in Minuteman Silos, 90th Strategic Missile Wing, F.E. Warren Air Force Base, October, 1983. I see this act on the part of the Air Force as gross neglect.

I believe that Nebraskans have the right to know and be made aware how their young people may be affected by the installation in their own backyard of the most massive, destructive weapons which have ever existed in the history of the world.

I know that the Air Force is not used to conducting such a study, even though such a study qualifies under the Social Well Being mandate. The Air Force should still have to conduct such a study.

In your Report, the Air Force attempts to "restrict" the stud, to the geographical locale of Kimball County in Nebraska. This is not an acceptable approach. Your Report narrows the issue to such an extent that you avoid having to address major issues which truly will affect our lives. The Air Force owes a more responsible and comprehensive response to the people of Nebraska--a response which makes them fully aware of possible consequences and what they are "buying" if they acquiesce to the installation of the MX Missiles.

I believe that the Air Force should employ a qualified and responsible agency to research and address all the issues involved with the psychological impact as a part of the Social Well Being sections. I will state some of the issues in the form of hypotheses on the next page.

Suggested Research Topics Regarding Psychological Impact of the Proposed Installation of MX Missiles in Nebraska

Givens: The MX Missile is the most destructive weapon ever devised by the human race. (differs from Minuteman Missiles)

In all probability, the deployment of the MX Missile will further escalate the arms race and increase the chances of nuclear war.

Living in close proximity to the MX Missile sites increases the danger of being destroyed in nuclear exchange and serves as constant reminder that we have planned for the efficient, potential death of millions of people. (including ourselves)

Therefore,

. . . IF MX MISSILES ARE INSTALLED IN NEBRASKA:

40 Hypothesis #1 -
To what extent may the Nebraskan people, especially the youth, INCREASE THEIR SENSE OF DESPAIR AND HOPELESSNESS? How may this sense of despair and hopelessness interfere with their thinking/planning for the future and their concept of "future"? How will it affect their vocational motivation, interest, preparation, and involvement?
(Note: Enclosed are research references as to the impact of "hopelessness" caused by fear of nuclear weapons on children and their functioning)

Hypothesis #2 -
To what extent may the Nebraskan people, especially the youth, EXPERIENCE AND INTERNALIZE FEAR as nightmares and horror images which come to the conscious mind throughout the day? How might such internalized fear contribute to a decrease in health and wholeness at various stages of life?

Hypothesis #3 -
To what extent may the Nebraskan people, especially the youth, show a DECREASE IN SENSITIVITY towards general humanness and well being of people? How could such a decrease in sensitivity contribute to domestic and foreign policies void of understanding (empathy), compassion, and goodwill?

Some Research References:

William A. Beardslee and John E Mack. The Impact of Nuclear Developments on Children and Adolescents.
Choices: A Unit on Conflict and Nuclear War. NEA Professional Library.
(Here, also, the other references, is a letter to Nebraska State Senators by Don Tilley, 4/5/83)

Sincerely,
Don Tilley

OUR YOUNG PEOPLE

4/5/83

- Don Tilley
4533 Starr
Lincoln, NE 68503

Let's look at the thinking of many of our Nebraskan young people. How different their thinking from the politicians and generals. Many of our young intuitively sense the interconnectedness of all of life and believe that people can learn to live together, even competing nations. Our youth are bewildered by the narrowness of thinking by politicians and generals.

Our young would find an affinity with Dr. Fritjof Capra, who has done research in high-energy physics at several European and American Universities and lectures extensively about the philosophical implications of modern science. Dr. Capra states ". . . politicians and generals --are all used to a fragmented approach and each group concerns itself with narrowly defined problems."

In his new book, The Turning Point, Dr. Capra states that this fragmented and narrow thinking has resulted in wrongthinking about deterrence. ". . . the current increase in armament clearly has nothing to do with deterrence," (U.S.A. already has more than sufficient to destroy the Soviets) but that the politicians and the generals have created the myth that U.S.A. is behind the Soviets in missiles. He claims that the Pentagon is "deliberately distorting the truth" for its own purposes. It's political.

A 16 year-old girl said, "adults see nuclear weapons as a matter of politics, but to young people see them as life and death." Young people in Nebraska believe that a nuclear war is going to occur soon and that they will be killed in it. They do not believe that adults understand their thinking nor feel their feelings of terror.

No governmental body currently represents the opinions of our young people about nuclear weapons.

Our young people see generals waffling about survival issues. Most generals do not have faith in building trust among rival nations, but only in military responses. Nor do generals see the relationships in being a "just society" as a major deterrent to war. The generals are saying build more. Generals are using old text books and loud voices which state that those who have the most "guns" will be the safest (or will have leverage in disarmament sessions)--old conventional thinking that ignores the nature of nuclear weapons. Their thinking is not able to ask the right questions nor provide a proper framework for solving the problems.

One set of questions framed by young people, with deep meaning for them, does not deal with "who has the most" or "who can destroy the other the most efficiently" . . . "or the most times over." But our youth are asking, "ARE WE SAFE?" "HAS THE POSSIBLE FEELING OF LESS SAFETY AND SECURITY" Our youth strongly believe that our politicians and generals have failed to make us more secure over the past ten years when they could have done so.

Young people do not buy the idea that a nuclear exchange can be limited.

Did you notice in the report last Saturday in the Lincoln Star (attached) that 59% of those students at Lincoln High and 70% of the students sampled at Lefler Junior High in Lincoln did not believe in the hard sell of the national administration that nuclear war can be limited?

These young people take nuclear weapons very personally. When asked, "Do you think a nuclear war will occur in your lifetime?"
- 41% of the Lincoln High Students and 51% of the Lefler Students said, "Yes."

Do you sense the significance? Our young people believe that they are not going to be allowed to live a natural life, but believe that they will die in a nuclear war!

Our young people are becoming very scared. Some imagine missiles coming towards them. Their families dying. Everybody dying. Skin falling off from their brothers and sisters. A world with no one on it. Death for all creatures.

It's affecting their vision of the future, their vocational interest and training, their creativity and inner security. They wake up with dreams at night of holocausts. Their hope for the future has been gutted until its all pretend. They know they will die in a nuclear war. Why plan for the future?

I ask the Senators to not be overly impressed by fast talk or superficially impressive arguments from the military personnel. The Center for Defense Information in Washington and the Institute for Defense and Disarmament Studies in Boston have access to the same information as the military and can point out the half-truths of the military which has a huge vested interest (i.e. The administration military budget will take 1.8 billion from Nebraska next year) The military men are just following orders and doing their jobs.

I ask the Senators to not be overly impressed with representatives from the State Department. We know that the State Department is not committed to disarmament, but only the appearance. So test the words of State Department Personnel carefully, for they are often full of sound and furry, signifying nothing.

The military, the State Department, and even Soviet defectors have a very limited, narrow perspective, and offer no vision, no hope for the world. They are not seeing the broad picture nor asking the questions which really need to be answered.

Rather, listen to our young people. They are wise. They sense intuitive what is best for the world. They feel the world is a live organism which has to be nurtured. They value cooperation.

This Unicameral Legislative Body is the protector of our young. They are vulnerable without political voice. You can be their voice and speak in their behalf. The young people are asking the right questions in the right framework: "ARE WE SAFE?" They answer "no." "WILL BUILD-

ING MORE NUCLEAR WEAPONS MAKE US MORE SECURE?" They answer "no."

But our young people make these requests of you, Senators.

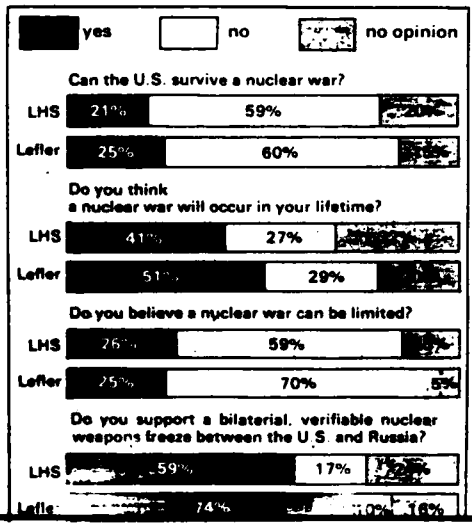
"WILL YOU STOP WASHINGTON FROM PREPARING FOR WAR?"
"WILL YOU DO ALL YOU CAN TO FREEZE NUCLEAR WEAPONS?"

Would you be willing to be the advocates of the young? (for nuclear weapons is now a local issue for Nebraska)

THE LINCOLN STAR / Saturday, 4/2

Teen-agers . . . and the bomb

Lincoln students see nuclear cloud in future



By Bob Reeves
of The Lincoln Star

Being a teen-ager is one of the most stressful periods in a person's life, psychologists tell us.

Not only does a teen-ager have to deal with physical and psychological changes on the inside, but — often for the first time in his life — he is forced to confront the realities of the world outside himself.

One of those facts of life which teen-agers have to face is the likelihood they may not have a future, because of the threat of nuclear war.

Teen-age concern with the possibility of a nuclear holocaust seems to be on the increase nationally, probably due to the growth of the nuclear freeze movement and the publicity it has received.

And Lincoln teens are no different. Most feel the threat of nuclear war has put a heavy cloud over their future. Students' views on nuclear war and the freeze were examined in surveys taken recently at Lincoln High School and Lefler Junior High.

The Lincoln High survey, conducted by senior Craig Reeves as a project for a Citizenship Lincoln class, was answered by 388 students out of the approximately 1,700 students in the school.

A total of 375 questionnaires were distributed to home rooms on a random basis. 300 were either returned unanswered or not returned.

Of those who completed the questionnaire, 41 percent answered "yes" to the question, "Do you believe a nuclear war will occur in your lifetime?" Thirty-two percent had no opinion and 27 percent said they did not expect a nuclear war to occur while they are alive.

Fifty-nine percent of the respondents said they support a bilateral, verifiable nuclear weapons freeze between the U.S. and the Soviet Union. Twenty-four percent had no opinion and 17 percent said they would not support a freeze.

The Lincoln Star [illegible] similar questions to 81 students in Ted Sizer's eighth-grade social studies classes at Lefler.

Of those students, 51 of whom had had some exposure to the nuclear freeze issue [illegible] 29 percent said there is a chance a nuclear war will happen [illegible] during their lifetimes and 70 percent said it will not. Only 25 percent [illegible] agreement between [illegible] and 70 percent had no opinion.

Lincoln High student Tom Fuller who voted in favor of the freeze said, "to me the freeze is a matter of life or death — I see total destruction if we don't do something (to stop the arms race)."

She said she believes most teen-agers are worried about the nuclear threat and would favor the freeze as one way to lessen the threat of a world-destructive war.

Brad Walker, a Lincoln High student who opposes the freeze, said he believes it wouldn't work because both sides would develop a way to continue making nuclear weapons without being detected.

While Walker said he considers nuclear weapons abolitists — "They should never have come into existence in the first place" — he believes the only reasonable course now is to maintain a balance of nuclear power with the Soviets "and learn to live with it."

Walker said he opposes the proliferation of nuclear weapons to other countries, however.

Balance and the growing interest in the freeze issue was evidenced by the fact that three different groups of students in his four classes chose to do special projects on the issue this year. Last year, for a similar assignment, nobody picked nuclear war, he said.

One of the students who studied the freeze issue for Reeves's class is Mike Rinn, whose father is a leader in the Lincoln freeze movement.

After learning about the effects of a nuclear bomb, Rinn said he would prefer to be at the center of the explosion rather than a few miles away. "I'd rather be vaporized immediately than have to wait for radiation sickness to hit me," he said.

Rinn said he has donated some of his allowance money to the freeze campaign and urged other students to attend freeze meetings. He said he believes most students who sign up in favor of the freeze had been pressured by friends who said they had done nothing, even though [illegible] writing letters to senators and congressmen and contributing to the freeze campaign.

When asked how often they think about [illegible] war, 48 percent of the Lefler students said "seldom" (once a month or less) and 38 percent said they never or never think about it. Sixteen students — or about 20 percent of the respondents — said they think about nuclear war once a week or more often. One girl said she thinks about it daily.

Twenty-one percent of the Lincoln High students and 38 percent of the Lefler students said they think the United States could survive in a nuclear war. Forty percent of the Lincoln High students and 35 percent at Lefler said they believe the United States trails the Soviet Union in nuclear weapons production.

Lefler student Dana Janecek said she believes the best hope of the United States surviving a nuclear war would be if the we have "more powerful weapons" than the Soviets. She also said she would favor supplying our allies with nuclear arms "so they'll have something to fight back with."

Seventy-three percent of the Lefler students agreed "friendly nations should have nuclear arms. Of those opposed to supplying our allies, one girl said, "It's hard to tell which nations are friendly," and a boy responded, "Look at Iran."

In response to another question, 57 percent of the junior high students said they worry about whether or not they are going to grow up.

"I wouldn't want to have any children if I knew it (a nuclear war) was coming. But if a happens, it's all over. There's nothing you can do about it," one girl said.

According to Lefler student Tresa Jewell, the nuclear arms race is senseless, because neither side will ever want to start an all-out war.

"Why do we have to have them (nuclear weapons) anyway?" she asked. "Nobody wants to die. Nobody wants to kill the whole wide world, everybody wants to have their kids grow up."

October 25, 1983

4333 Starr
Lincoln, NE 68503

The Honorable J.J. Exon
330 Hart Building
Washington, D.C. 20510

Dear Senator Exon:

I request your advice as to means of appeal and as to possible legal action we can take to encourage, or better, to mandate the Air Force to prepare an Environmental Impact Statement concerning the MX Missile which substantively addresses the major issues which are not in the Draft Environmental Impact Statement. I am particularly concerned with the psychological impact. See enclosures.

We were disappointed with the quality of the Air Force Report.

Sincerely,

Don Tilley

Don Tilley

I am writing this letter in my own behalf, but also to obtain information for several other organizations, including Nebraskans for Peace.

Enclosure: Letter to AFRCE-BMS/DEV

403

MARK TROUT
RR 2 Box 43A
LYMAN NEB
69352

SIRS:

103 I SUPPORT THE PLACING OF THE MX MISSILES IN EXISTING SILOS. I LIVE WITHIN A MILE OF A SILO AND WORK AROUND THE AREA IN WHICH ANOTHER IS LOCATED. TO MANY PEOPLE THE SILOS AND AIR FORCE PERSONAL ARE COMMON AND ALMOST EVERYDAY NORMAL SIGHTS. I BELIEVE THAT THE AIR FORCE SHOULD ASK THE FARMERS OF THIS GOSHEN COUNTY AREA. MOST SUPPORT THE EXISTANCE OF THE SILOS AND THEIR REASON FOR BEING THERE. THANK YOU FOR LETTING ME EXPRESS MY OPINION.

THANK YOU

MARK TROUT

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-335

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TESTIMONY FROM

CHEYENNE, WYOMING

PUBLIC HEARING

REFER TO

PAGE 6.2-370

Public Hearing Transcripts

A PUBLIC HEARING

ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR

PEACEKEEPER IN MINUTEMAN SILOS PROJECT

THE HEARING OFFICER: Col. Allan Smith

THE PANEL: Lt. Col. Reese Padfield
Col. Warren Hickman
Capt. Mike McMullen
Lt. Col. Peter Walsh
Maj. Dave Taggart
Dr. Dick Kramer
Mr. Fred Hickman

November 1, 1983
8:00 p.m.
Community Center
7th & Lawson
Pine Bluffs, WY

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Frontier Reporting Service
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COL. SMITH: Good evening, ladies and gentlemen, welcome to this, the first of seven hearings scheduled in Nebraska and Wyoming on the Draft Environmental Impact Statement for the Peacekeeper in Minuteman Silos Project.

I am Col. Smith, and my role is simply to conduct the hearing. I've not been involved in the development of the Peacekeeper Project, and I will not be making any recommendations or decisions concerning it.

First on the agenda this evening there will be an explanation of the Peacekeeper Project and Draft Statement by Lt. Col. Peter Walsh, our team briefing chief. Following this presentation, statements, comments from government officials will be received. We will then have a short break. After the break statements, comments, questions from individuals, representatives, organizations will be accepted.

We ask that all the speakers limit their statements, comments to no more than five minutes. The questions will be answered by a team of specialists and experts. And the hearing is scheduled to conclude at 11:00 p.m.

To provide the greatest opportunity to all who wish to present comments and questions, we do request that you fill out one of the cards available in the lobby. Speakers will be recognized from the floor only if time permits and after all of those registered to speak have had the opportunity to do so. If time does not permit the opportunity to speak tonight, you certainly may submit written comments or statements. This may be done by presenting such statements to the registration table or mailing them to the address on the hearing handout. The address will also be on a slide at the end of the hearing.

A Court Reporter is present on the far side of the room from me there. She will make a verbatim transcript of all comments, statements, questions made here this evening. A video tape of the proceedings is also being made as a backup to the transcript to insure that the record is accurate and complete. For the members of the press, Capt. Pat Mullaney is present at the back of the room to handle any special requests and questions that they may have.

We're now ready to have the briefing from Lt. Col. Peter Walsh, our briefing team chief. Col. Walsh.

LT. COL. WALSH: Good evening, ladies and gentlemen. I am Lt. Col. Peter Walsh, director of the Environmental Planning Division for the Air Force regional civil engineer at Norton Air Force Base. In this position, I am responsible for the preparation of the Environmental Impact Statement for the Peacekeeper in Minuteman Silos Project. Today I intend to summarize the major findings of the Draft Environmental Impact Statement issued on October 14th for the project.

However, before reviewing the findings, I shall provide the background and context for the statement. Specifically, I shall cover the following subjects: First, I shall review events

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leading to the Presidential decision to deploy the Peacekeeper in Minuteman silos. Second, I shall briefly describe the project. Third, I shall discuss the scope of the Environmental Impact Statement. Next, I shall describe the process and methods used in the preparation of the statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final Environmental Impact Statement.

The same briefings will be presented at all public hearings so everyone will receive the same information.

In accordance with the Presidential decision of April 19, 1983, the Air Force plans to deploy the Peacekeeper Missile System within the 90th Strategic Missile Wing at F.E. Warren Air Force Base near Cheyenne, Wyoming. In making this decision, the President was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the President on January the 3, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

The Project described by the President entails the following:

- Replacement of 100 of the existing Minuteman III Missiles with 100 Peacekeeper Missiles in the 400th and 319th Strategic Missile Squadrons located near Cheyenne.

In order to implement this decision, the following actions are required:

- Modification of existing facilities and construction of new facilities at F.E. Warren Air Force Base.
- Modification of 100 missile launch and 10 launch control facilities in the aforementioned squadrons.
- Installation of five additional buried cable systems connecting the two squadrons.
- And lastly, upgrading the existing deployment area road network.

The project will commence in early 1984, soon after the final Environmental Impact Statement is filed. Initial operational capability, defined as the first 10 operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989.

Operations of the Peacekeeper will be similar to the Minuteman System. The major differences are in the transport and emplacement of the missile. The Minuteman stages are transported fully assembled and emplaced in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle, and emplaced in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman System.

Similarly, the Peacekeeper System will be as safe, if not safer, than the Minuteman System. An accidental burning or detonating of a Minuteman has never occurred during any of its

past 19 years of deployment. The Peacekeeper System has benefited from this field experience as well as improvements in technology. Development and use of insensitive high explosives in the Peacekeeper reentry system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command. The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than one in ten trillion.

Given the Presidential decision and its implementation requirements, the Air Force prepared the Draft Environmental Impact Statement in accordance with the Council on Environmental Quality Regulations. The statement assesses the impacts of the deployment and peacetime operation of the system, alternative project elements, and the no-action alternative of retaining the existing Minuteman III Missiles.

This statement does not cover the analyses of alternative basing modes, nor deployment locations for the Peacekeeper Missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the "Jackson Amendment", exempted such analyses from the requirements of the National Environmental Policy Act. Likewise, analyses of other basing modes such as super hardening of the protective structures, deep basing, and ballistic missile defense are not included in this statement. They are excluded

because first, they were not part of the President's decision; second, the Air Force does not intend to propose any of them in the reasonably foreseeable future; and third, Peacekeeper deployment is not connected to any of these potential systems.

Furthermore, the environmental impacts of nuclear attack are not analyzed in the statement because the effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operation.

Following the President's decision and subsequent approval by Congress, a notice of intent to conduct the Environmental Impact Statement process and the schedule for scoping meetings was published in the Federal Register on June 13, 1983. The scoping meetings were held between June 27th and July 8, 1983. Public meetings were held in Cheyenne, Pine Bluffs, Torrington, and Wheatland, Wyoming; and Kimball and Harrisburg, Nebraska. Additional meetings were held with federal agencies in Denver, Colorado and Kansas City, Missouri and with Nebraska state agencies in Lincoln, Nebraska. The purpose of these meetings was to obtain information for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the development of environmental resources to be studied.

A study area was defined for each environmental resource in a two-step process. Study areas initially encompassing the

the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project. Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analyzed within both the regions of influence and the areas of concentrated study. Four categories formed the framework for impact analysis. They are area, timing, intensity, and significance.

Area is defined as either site, local, or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site. And, region is the previously discussed region of influence for each resource.

Timing is defined as either short term or long term. Short term is the period from commencement of work until the system is fully operational. Long term is the fully operational phase of the system beginning in 1990 and continuing until a

decision is reached to decommission.

Intensity is defined as negligible, low, moderate, or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during the project planning or requires extensive action to mitigate.

Upon completion of the analysis, the Draft Statement was prepared and distributed for comment. The Draft Statement consists of four chapters and a summary totaling about 500 pages. A set of 13 environmental planning technical reports support the Draft Statement and are available for review at local libraries.

Notice of the availability of the document was published in the Federal Register on October the 14th. On that date, the document was also available at libraries and federal, state, and local agencies within the study area.

In this review, I shall present a description of each resource studied. This will be followed by a description of the beneficial effects, if any, and a summary of the area, timing, and intensity of adverse impacts. Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rationale for such judgment will be given.

Employment demand describes the available regional

labor force which may be used by the project, and the demand for non-local labor which may result in the immigration of workers and their families. The analysis indicates a short and long-term, beneficial effect on the City of Cheyenne and the region of influence because of the increases in employment and income.

During the peak employment years 1986 and 1987, approximately 3,300 persons will be employed as a result of the project. There will be about 1,800 direct and 1,500 indirect jobs. Approximately 1,000 of the 3,300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements would be filled through either inmigration or weekly commuting. When the system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demand. Local, short-term and long-term beneficial effects result from potential increases in sales value and rental income due to increased housing demand in the Cheyenne urban area and the City of Kimball. There is, however, an opposite effect on the consumer, particularly those on fixed income and first-time home buyers.

The analysis indicates a local, short-term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the City of Kimball exceeds the projected net

vacancy rate. Also the market response would have to exceed the highest historical annual production level. The analysis further indicates local, long-term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as outmigration occurs during 1986 through 1990.

The local, short-term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

Public finance describes the budgets, fiscal resources, and obligations of all major governmental entities, including school districts and urban service areas.

The analysis indicates a local, short and long-term, beneficial effect because of additional revenue to governmental entities due to increased sales and property taxes, and other taxes and fees.

The analysis further indicates local, short-term, moderate impacts because many local governmental entities would face potential budget imbalances. This would require either an increase in revenues or a reduction in service-related expenditures during peak project activity. The analysis also indicates local, long-term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast,

asphalt, roofing, lumber, wood ties, structural steel, reinforcing steel, and steel rail.

The analysis indicates that regional, short-term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analysis further indicates a regional, short-term, low impact resulting from the project's increased demand on regional production capacities of cement, aggregate, ballast, asphalt, and roofing.

Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions, and selected indicators of behavior.

A local, short-term beneficial effect is anticipated due to the improved economy.

The analysis indicates local, short-term, moderate impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with the immigration of population.

The analysis further indicates that local, short-term impacts were judged significant because the population subgroups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job-seekers, adolescents, and fixed-income elderly.

Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal justice, fire protection, health care, human services, and libraries.

The analysis indicates a local, short-term, moderate impacts. These impacts are due to a seven percent increase over what is projected for the student population without the project in Laramie County School District Number One in the peak year, 1987. Also contributing to the impacts is the need for additional firefighters, vehicles, and space for the City of Cheyenne Fire Department; the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne; and increased demands in health care and human services.

The analysis further indicates local, long-term, moderate impacts are a result of the continued need for additional staffing and classroom space in Laramie County School District Number One. These impacts are also the result of the need for an additional law enforcement in the City of Cheyenne.

The local, short-term impacts were judged significant because of the overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control, and the potential for human service needs that are unsatisfied.

Utilities describes water treatment and distribution

systems, wastewater systems, solid waste systems, stormwater facilities, and telephone service.

The analysis indicates that site, short-term, low impacts are a result of a further overloading of an existing sewer downstream of the F.E. Warren Air Force Base sewer and from the need for additional on-Base telephone equipment. Local, short-term, low impacts result from the further degradation of the performance of existing wastewater systems in the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and stormwater facilities in the Cheyenne urban area as a result of new land development in the region.

The local, short-term impacts were judged significant because the overloaded operating condition of the wastewater systems in the Cheyenne urban area and in Torrington will be aggravated.

Energy resources includes the supply and distribution systems for electrical power, natural gas, petroleum fuel, and coal.

The analysis indicates local, short-term moderate impacts as a result of the need to expand the capacity of a local electrical substation serving F.E. Warren Air Force Base by about 40 percent. Local, long-term, low impacts result from increased energy demands. The analysis also indicates regional, short-term, low impacts as a result of the depletion of nonrenewable energy

resources from the construction phase of the project. Regional, long-term, low impacts are a result of the depletion of non-renewable energy resources by the Peacekeeper operating personnel.

Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design, operation of roads, railroads, aviation facilities, public transit, and pedestrian and bicycle facilities.

A long-term, beneficial effect is anticipated due to the improvements to roads and bridges at the site, local, and regional levels.

The analysis indicates site, short-term, low impacts as a result of construction activities on and near roads in the deployment area. Local, short-term, moderate impacts are indicated as a result of reductions in the level of service at 13 of 26 impacted intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F.E. Warren Air Force Base Randall Avenue Gate due to the influx of construction workers and materials onto the Base. The analysis further indicates regional, short-term, low impacts as a result of existing capacity constraints and increased demand at Cheyenne airport.

The site, short-term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek

alternative or alternate travel routes. Local, short-term, moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area, and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land use comprises both urban land uses in developed communities where population immigration is expected and rural land uses in the deployment area where direct impacts from project development would occur.

A local, long-term beneficial effect may occur from the infill of vacant areas within the city boundaries of Cheyenne and Kimball. The analysis indicates site, short-term, low impacts are a result of the temporary interruption of agricultural land use during cable trenching. The site, long-term, low impacts are a result of restrictions on residential land use within explosive safety zones. The analysis also indicates local, short-term, low impacts are a result of the underutilization of land developed to support mobile homes beginning in 1987 as out migration occurs. Local, long-term, low impacts are a result of the continuing underutilization of land developed to support mobile homes.

Recreation includes regional, resource-based recreation which is related to federal, state, and other lands offering rural outdoor recreation opportunities and local, user-based, recreation which is related to municipal and county-owned parks and facilities within urbanized areas.

The analysis indicates local, short-term, moderate impacts as a result of increased demand for parkland, facilities, and staffing. The analysis also indicates local, long-term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation system, requiring additional expenditures for operations and maintenance.

The analysis further indicates regional, short-term, moderate impacts primarily as a result of the increased demand at Medicine Bow National Forest and Curt Gowdy, Glendo, and Guernsey State Parks. These regional impacts will become low in the long term due to reduction in the number of users when outmigration occurs.

Local, short-term, moderate impacts were judged significant because of the need to seek funding outside of the normal budgetary processes in order to provide additional local parkland and recreational facilities. Regional, short-term, moderate impacts were judged significant because -- because the additional use of regional recreation facilities will exacerbate an existing overcrowded situation thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

Cultural resources include four separate elements: Paleontological, prehistoric, historic, and American Indian cultural resources. The analysis indicates site, short-term, moderate impacts as a result of ground-disturbing activities

associated with Peacekeeper deployment that may affect historic and prehistoric sites. The analysis also indicates site, long-term, low impacts as a result of the use of the buildings at F.E. Warren Air Force Base currently listed on the National Register of Historic Places.

Visual resources include scenic resources and the visual environment, as well as an evaluation of the visual quality of the region. The analysis indicates site, short-term, low impacts due to clearing of vegetation and grading activities during construction.

Water resources includes groundwater hydrology and quality, surface water hydrology and quality, water use and demand, and constraints on water use.

The analysis indicates site, short-term, low impacts at F.E. Warren Air Force Base, launch facilities, and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology. Site, long-term, low impacts are a result of permanent changes to stormwater runoff characteristics. The analysis also indicates local, short-term, moderate impacts because induced water demand exceeds the projected capacity of the existing delivery system for the Cheyenne urban area.

Local, long-term, low impacts are predicted because of the increased water demands, increased surface runoff, and increased erosion and sedimentation in the Cheyenne urban area. Regional, short-term, low impacts are also predicted as a result

of increased runoff entering the Crow Creek due to additional development.

The local, short-term, moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

Biological resources include vegetation, wildlife, fisheries, and unique and sensitive habitats.

The analysis indicates site, short-term, moderate impacts as a result of the potential immediate disruption, by construction or modification activities, of riparian vegetation and wildlife habitats. The analysis also indicates site, long-term, moderate impacts as a result of construction activities that may potentially disrupt trees and shrubs in riparian land -- riparian and wetland habitats that have a long recovery period. The analysis further indicates that there are regional, short-term, moderate impacts. These are the result of general recreational pressures, poaching, dog kills, and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park. Regional, long-term, low impacts are a result of the random shooting of the Swainson's Hawk and other birds of prey.

The site, short-term, moderate impacts were judged significant because of the limited extent of riparian and wetland habitats. The site, long-term, moderate impacts were judged significant because of the long recovery periods of the riparian vegetation.

Regional, short-term, moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased human activity on big game in the areas of concentrated recreational pressures. Regional, long-term, low impacts were judged significant because of concerns over declining populations of some species of birds of prey.

Threatened and endangered species include plants, wildlife, and aquatic species which are protected by federal law as threatened or endangered. Also included in this category are state-protected rare, threatened, or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because they are of special state concern.

The analysis indicates site, short-term, high impacts as a result of the disturbance of the habitat of the Colorado Butterfly Plant and the Woolly Milkvetch. Site, high impacts will continue in the long-term as a result of the loss of habitat for the Colorado Butterfly Plant. The analysis further indicates regional, short-term, low impacts as a result of the potential for random shooting of the Bald Eagle and accidental catching of the Greenback Cutthroat Trout. Regional, long-term, low impacts are a result of the continuing potential for random shootings of the Bald Eagle.

All of these impacts were judged significant because the Bald Eagle and Greenback Cutthroat Trout are federally-listed

endangered species, also, the Colorado Butterfly Plant is categorized as a Category One species by U.S. Fish and Wildlife Service, and the Woolly Milkvetch is listed as rare by the Wyoming Natural Heritage Program.

Geologic resources include geological hazards, energy and mineral resources including aggregate, and soil resources.

The analysis indicates site, short-term, low impacts as a result of the potential for soil erosion during construction activities. The analysis further indicates local, short-term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading. The analysis also indicates local, long-term, low impacts resulting from the need for aggregate resources for road maintenance.

Noise analysis includes vehicular, air, and railroad transportation, and construction activity. The analysis indicates that the impacts will be negligible.

Air quality describes the effects of project construction, operation, and related transportation activities upon future air quality. The analysis indicates local, short-term, low impacts. These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a result of construction activities.

As previously discussed, project alternatives were

analyzed. These analyses focused on alternative road configurations, cable routes, and staging areas. The analyses have demonstrated that for most of the resource areas, the level of impact is either negligible or low and not significant, and does not vary within each of the three sets of project element alternatives. For four resource areas, transportation, land use, cultural resources, and biological resources, there are variations in the level of impact among alternatives. I shall summarize these.

As shown on this slide, three alternative egress routes for transporting the Peacekeeper stages from the Base were considered. Alternative R-2, which is the proposed action, is designed to allow all northbound stage transporter travel to exit the Base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road bridge clearance problems, and the egress of the stage transporter at the Central Avenue Interchange and at the Missile Drive Interchange to travel north or south.

Alternative R-3 involves providing stage transporter access to Interstate 80 via Round Top Road which would require new on/off ramps at Interstate 80. Access to the north would still -- would still be via Interstate 25 near the Central Avenue Interchange.

The impacts among the alternatives did not vary

appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads off Base, in addition to new on/off ramps at Interstate 80. This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Round Top Road may tend to stimulate urban development west of F.E. Warren Air Force Base which would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transporter route has the potential for intersection -- intersecting cultural properties eligible for the National Register of Historic Places. In addition, all three alternatives have a high and significant impact on the habitat of the Colorado Butterfly Plant because of potential disturbance during the construction phase of the project. This impact was judged significant because of U.S. Fish and Wildlife Service's Category One classification of the plant species.

For the project five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corridors have been identified for environmental analyses.

Three alternatives follow overland routes; two of these follow easements previously obtained by the Air Force for communications cables. One alternative follows an existing road

right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way.

Impacts among the alternative cable paths did not vary appreciably with the exception of land use, cultural resources, and biological resources. The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to the documented presence of archaeological sites in the area which the cable will traverse and the high probability that these routes would destroy additional, previously unrecorded sites. The remaining four routes have been assigned a low or moderate impact, based upon the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing critical raptor, riparian, or aquatic habitats. Four of the seven alternatives would have moderate impacts, while the other three would have low impacts. The differences are due to the expected frequency of encountering the critical habitats. These impacts were judged significant because of the limited areas of these habitats.

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center. The proposed action would have staging areas located on the Base, and in Cheyenne, Wyoming and Kimball, Nebraska. An alternative would have temporary support areas only on the Base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered did not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the proposed action, that includes a staging area in Kimball, because of the potential of congestion on community roads. Similarly, impacts on cultural resources would be low for the proposals that include staging areas on the Base because of the presence of prehistoric and historical cultural resources.

In conclusion, the Draft Environmental Impact Statement projects beneficial effects in employment demand, housing, public finance, construction resources, social well-being, transportation, and land use. It further predicts, that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transportation, recreation, water resources, biological resources, and threatened and endangered species.

To the extent practicable, standard practices that

could avoid, reduce, or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures which could be used to reduce impacts that have been identified. These include requesting funds through existing federal impact aid to school districts for Laramie County School District Number One. The Department of Defense and the Wyoming and Nebraska government entities have agreed to enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense which will mitigate adverse impacts resulting from the project.

The statements, comments, and questions provided during public hearings and written comments postmarked by November 28, 1983 will be analyzed. After the close of the comment period, the Air Force will review and evaluate all inputs to determine how they should be responded to and the need for revisions to the analysis contained in the Draft Statement. The completion of this work will result in the development of the final Environmental Impact Statement to be released by January 31, 1984.

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this evening. This completes the briefing portion of the hearing. I shall now turn the program back to Col. Smith.

COL. SMITH: Thank you very much, sir. I'd like now

to introduce the panel of experts and specialists that will be assisting Lt. Col. Walsh in responding to your questions this evening. First we have Col. Warren Hickman. Col. Hickman is the Site Activation and Task Force Commander at F.E. Warren Air Force Base. Next we have Lt. Col. Reece Padfield, who is the Assistant Chief of the Requirements & Integration Division of the Ballistic Missile Office at Norton Air Force Base, California. Next we have Major Dave Taggart, who is the Staff Judge Advocate and Legal Officer of the Ballistic Missile Office at Norton Air Force Base, California.

Next we have Capt. Mike McMullin, who is Air Force Headquarters Peacekeeper Liaison Officer in Cheyenne, Wyoming. We have Mr. Fred Hickman, who is the Human Resources Director for URS-Berger San Bernadino, California. Finally, Dr. Dick Kramer, who is the Natural Resource Director for URS-Berger San Bernadino, California. That constitutes the team, these people along with Lt. Col. Walsh, and they will be responding to your questions this evening.

We have one public official this evening who desires to make a statement. We have the Mayor of Pine Bluffs, Wyoming, Mr. Timothy Conner.

Mayor Conner, if you would like to present your statement at this time, you may do so either in the center of the room or come forward to the podium at the front, whatever is most convenient, sir.

187 MAYOR CONNER: Thank you, Col. Smith. My direction is not so much as a statement but quest.ons that I would like to pose that have been posed to me, and I come here tonight representing the Town of Pine Bluffs.

Your statement reflects that the roads --.some roads will have to be beefed up, and we have now identified that you will go south of Pine Bluffs to Bill Higday's and/or to Mr. Theobald's farms, and we are now saying that if you're going south you'll have to run over the town's streets. And we would like to know -- we, council members and myself would like to know if you damage the roads, will they be fixed by the Air Force or by the Department of Defense? 984

LT. COL. WALSH: This is an important question that's come up quite a few times at previous meetings, and it's also been addressed for the last couple of weeks. The answer -- quick answer to your question is yes, if the damage is caused by the transport of the Peacekeeper System we will definitely reimburse for the upgrade and thereafter the maintenance of those particular streets and roads.

But I think rather than just give you a quick answer, it would be better for me to describe the entire process for the defense access roads. Basically the Air Force has prepared a defense access roads in this report. Basically this document provides what is the specifications that we need roads constructed to, what's the -- the weight of our vehicles, the load bearing of

the wheels, et cetera. This was passed to Military Traffic Measurements Command which works very closely with the Federal Highway Administration. These agencies have been working over the last couple of months very carefully, closely with the State Highway Departments.

The State Highway Departments have each been given $50,000 each to do some preliminary analyses of the streets and roads that we would like to traverse to determine their adequacies for transporting (inaudible). Based upon the results of that analyses, the State will come back to the Federal Highway Administration with a program of what needs to be done to upgrade streets to support our particular needs. For the Federal -- for the military construction program money will be allocated to the states to carry out that particular work. Thereafter, any maintenance that is a result of the Peacekeeper System, either routine maintenance which will help us transport our vehicles or maintenance because of damage caused by the Peacekeeper System will be reimbursed by the Federal Government. And that's the answer to that.

MAYOR CONNER: Thank you. My next concern is I have a feeling that if you miss project the impact in Pine Bluffs, and I realize that it's an estimate, and somewhere down the road those figures change and we have significant impact of a couple hundred people -- 300 people that would traverse into our trailer park, because you're talking mobile homes, our sewer system according 218

to the impact statement, the sewer ponds will hold the impact, but the pipes that lead into our main system would not. Can we, as the town, come back and ask the Department of Defense or Air Force or whoever for funds to upgrade our sewer system if in fact we have impact in that area? 218

LT. COL. WALSH: In any document such as this where we're trying to predict the future, naturally it's somewhat difficult. The DEIS document is not a blueprint of the future but how we project the future without any further action being taken either by the local governmental entities or by the Air Force. Right now we are predicting a very low increase into the population for the Pine Bluffs area. If that prediction should be wrong, we will have to reevaluate possible mitigation action. That would be applied by the Federal Government in conjunction with the local city authorities.

MAYOR CONNER: Thank you, that's all I have.

COL. SMITH: Thank you very much, sir. We certainly appreciate this fine facility that you have available here in Pine Bluffs and we appreciate the hospitality extended to us here this evening.

Let's take about a 10-minute break at this time. When we return we'll start in with the comments, questions, statements of other persons. Let's -- we'll recess for about 10 minutes.

(Whereupon the proceedings were recessed at 8:54 p.m.

(Whereupon the proceedings were reconvened at 9:04 p.m.

COL. SMITH: We have several people who have filled out cards in the lobby indicating that they have either questions or statements to make. I'll go through those people first, and then if we have time remaining we'll take questions, statements from the floor.

First I have a card stating Mr. Kenneth W. Macy of Pine Bluffs, Wyoming. Yes, sir.

377 MR. MACY: Thank you, Col. Smith. Basically I only have a question or two. I haven't attended prior meetings so I'm not very well informed.

On the subject of air quality as related to the county roads, no impact was indicated in the comments concerning dust or otherwise. Are we going to operate county roads where they won't be dusty or do we consider the travel not an impact of any consequence? 1486

LT. COL. WALSH: I would like to answer that question -- or start off the question as to what we will do to the county roads or what type of upgrade will occur there, and then I will ask Dr. Kramer to discuss how the fugitive dust determinations were made.

Basically, as I indicated to the Mayor, we're working very closely with the state highway agencies who are in turn working closely with the county road agencies on first of all,

analysing capabilities of the roads, and then looking at what do we have to do to make them suitable for the transport to the Base. The type of upgrade will be determined by the State and be suitable for carrying that particular load. We do not know at this particular time what the end result will be, whether it will be continued gravel roads or hard-surface roads. So we've had to make some approximations in our analyses. With that introduction, I will turn it over to Dr. Kramer to explain how the fugitive dust determinations were made.

DR. KRAMER: We did look at fugitive dust for all phases of construction including roads either upgrade or travel on the roads and in effect use what you might call the worst case or most likely severe impact, and all of that still gave us a negligible effect.

MR. MACY: So you would say that it's basically a negligible effect over --

DR. KRAMER: Yes, over and above existing conditions as they now appear. In normal usage, even agricultural usages in the field, as you're aware, that ambient background is more severe than would be added traffic or construction activity.

MR. MACY: The second question I would like to ask is in the impact from recreation and biological resources, considerable notation was made to the effects, impacts in a forested -- Medicine Bow and in established state parks. Very little notice impact was mentioned towards wildlife species and similar recreation

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activities on private and/or other public lands in the region.

Are those considered to be equivalent or is the primary impact going to be aimed by this type of people that the public now existing public facility in your estimate?

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DR. KRAMER: We looked at the combination of, as you say, recreation and biological, both the likely effect of added recreation on these resources from swimming to camping to hunting, and from, shall we say, drawing a picture of the existing circumstances there is hunting on private land as well as state parks. We could assess really only what was happening at the state parks as the more likely magnets of activity, and all hunting is regulated by licensing anyway. So the effect on wildlife populations per se would be very little change from the way it is now because -- well, not because, unless the State were to change its policy, which it does from year to year, to manage these populations, for example there was a lot of available Pronghorn population this year so, you know, it was almost anybody take whatever he wanted. But that was a management decision on that population, and that can change from year to year.

We see no difference in that over the lifetime of the project. So I'm saying that yes, we looked at both of that from a standpoint of recreation as well as the populations of the animals.

MR. MACY: But what I'm trying to get across is do you feel that the impact is more directly related to the public-owned

facilities such as national forests and parks as they now exist or would it -- the impact be general as those activities are now even though it was easier to make your assessments there, would you -- could you estimate there or will the type of people that come in be more attracted to the now existing public facility?

MR. HICKMAN: The recreation area was actually covered under human resources. And we actually looked at them from a different side. Whereas the natural resource evaluation was that of the animal species themselves, ours were particularly of both recreational and to some extent unlawful activity, which is with respect to poaching and other problems with animals.

We looked at poaching and unlawful killing of animals directly with respect to the records that the State and county has for those violations period. And we attempted to show the relationship between changes in population and the effect on increases in animal violations of the poaching nature. What we saw was there is a relationship, but it was one that was very difficult to determine specifically and exactly.

In our evaluation we have concluded that with growing population there is a likelihood that problems of poaching and of killing animals out of season may increase. We really weren't able to specify whether they would or not, but qualitatively, we allowed that they may indeed increase, and the increase could take place as easily on private land as it could on public land.

MR. MACY: Thank you. In other words, it's an occurrence

that's there but it's not necessarily significant to this kind of project, it's just part of an increase?

MR. HICKMAN: Based on our studies we weren't able to specify any exact increase that would take place, but we would recognize that if there is to be an increase in population, there is some possibility that there would also be an increase in those violations.

MR. MACY: Thank you.

COL. SMITH: Thank you very much, sir. The next card I have is a Mr. David Hansen, who is a rancher in Meriden, Wyoming, I believe it is. Good evening, sir.

356 MR. HANSEN: Yes, I'd like to address for cattle. He keeps talking about deer and other animals, but what about the effects on livestock, dust, you know, can wear their teeth out, weight loss, stress, that type of thing. And all these pastures where these roads would go through, if they're going to increase the traffic, rebuild the roads, cattle going to water back and forth, that type of thing, getting hit by vehicles.

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DR. KRAMER: I guess we would have to say we don't see any noticeable likely change that's attributable to this project over and above the existing conditions there. As we have anslyzed it, it would be negligible -- impact would be negligible from added traffic or construction.

MR. HANSEN: Now, I know when they put the cables in before there were cows that would walk out there and break their

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legs, you know, in the night or whatnot, and this should be addressed. 1144

LT. COL. WALSH: What you're suggesting is a mitigation action to accompany the work of either putting the cables in on the roads to insure --

MR. HANSEN: Uh-huh.

LT. COL. WALSH: -- that either the cows are not let outside of the pastures where we're putting a trench across the pasture, that we take some action to prevent them from falling into the trench at night; is that correct?

MR. HANSEN: Yes, uh-huh.

LT. COL. WALSH: We should make sure that it's put in a proposed mitigation action?

MR. HANSEN: Yes, thank you.

COL. SMITH: Thank you, sir. Our next speaker, we have a card from Mr. Tim Strand of the Western Solidarity Organization in Cheyenne, Wyoming. Mr. Strand.

309 MR. STRAND: Thank you. My question is concerning the expansion of the system. And in just a brief history, two years ago Caspar Weinberger, Department of the Defense, and the Congress rejected this very plan of putting the MX in existing Minuteman silos because of the question of vulnerability of putting the MX in a non-hardened silo. In the meantime I know the Air Force has continued research and development on both ABM super hardening silos and other plans to help insure surviveability 35

of the MX.

In a recent issue of Aviation Space and Technology, there is a quote saying that "One of the plans of the Air Force on the silos in shelter super hardening, the research and development effort is paced to provide the option for basing Peacekeeper in super hardened silos by 1988." Yet this EIS does not address that question. In fact you mentioned in the introduction that you are not planning super hardening with ABM or other systems in the reasonable foreseeable future.

I would think on an agricultural point of view five years is not an excessive reasonable foreseeable future prediction, and I still find it rather odd and curious that with the research and development that has taken place and with the logic behind the need for super hardening, I still find it pretty difficult to explain why you are not addressing super hardening ABM silos et cetera in this draft EIS. I'm really interested in how you define reasonable foreseeable future and the effect of super hardening and the effect of land, water, et cetera especially the effect on agriculture. 35

CAPT. McMULLIN: Thank you, Mr. Strand, it's good to see you again. To give you a little background -- of course you quoted -- that particular article came out of Aviation Space and Technology. Of course that is not a Department of Defense publication.

Let me backtrack a little and review with you as

Col. Walsh did the President's recommendation. As you know he tasked and formed a special commission known as the Scowcroft Commission to review the entire strategic forces of the United States and pay particular attention to our land based Inter-continental Ballistic Systems. In their review, they forwarded several recommendations to the President which he in turn whole-heartedly adopted. Those recommendations included the immediate deployment of 100 Peacekeeper missiles in existing Minuteman silos in Wyoming and Nebraska; and a second phase to that was full on research and development programs to look at technology programs that could be used in various applications.

Part of those technology programs included, as you suggested, the super hardening. That super hardening is being looked at in a variety of ways. One of the ways in which it is being addressed is the super hardening of silos. There are no current plans to take advantage in this point in time of that super hardening with the deployment of the Peacekeeper Missile System. It is purely a research and development program and could have other applications.

Another part of that technology program that the Scowcroft Commission recommended was to look at mobile type basing to address the long term surviveability question, to look at deep underground basing, and to look at antiballistic missile systems or ballistic missile defense systems. The President in recent months has asked the Department of Defense to expand its horizons

to that particular issue, the ballistic missile defense issue for the review of more applications than just defending our land based ICBM systems with an antiballistic missile system.

But the point and really the heart of your question and the answer to your question is the Air Force nor the Department of Defense has any plans in 1988 or 1984 to super harden any of these existing Minuteman silos. We are purely looking at the super hardening feasibility. Can we achieve levels of hardness adequate enough to make a land based missile silo more survive-able, but that is only one possible application.

MR. STRAND: Thank you. I don't want to belabor the point, but I would encourage you to put some sort of estimation of what the effect on agriculture would be so people can be thinking about that in the future, and that's a simple request.

CAPT. McMULLIN: We appreciate your comment.

COL. SMITH: Thank you very much, sir. Our next speaker or person with questions is Mr. Robert Maffeo, I believe it is, of Meriden, Wyoming. Good evening, sir.

378 MR. MAFFEO: How many people do you expect to be working at one time at one site?

COL. HICKMAN: At one time at one site we would -- we would not expect that number to exceed 30 people. That's a maximum. 147

MR. MAFFEO: In a given area, I don't know what you would call them, but say the (inaudible) missiles, how many of

those sites would be worked on at one time?

COL. HICKMAN: We do not believe that -- right now our plan does not call for us to work anymore than ten sites at a time.

MR. MAFFEO: Okay. What kind of a minimum specification to be given to the Highway Department for the roads as grading, low capacity, drainage? **985**

LT. COL. WALSH: The specifications given pertain to the weight, the height, the wheel base, turning radius, et cetera. We've also provided in those specifications desired routes which we would like to travel so that the State can start looking along those desired routes to see the adequacies and clearances, the adequacies of bridges and culverts to withstand the weight as well as the adequacy of the wearing surface to withstand the weight without showing any damage after one transit.

MR. MAFFEO: You didn't supply them with any minimum specifications as to the actual construction of the road?

LT. COL. WALSH: The determination of, first of all, the adequacy of the road as it presently exists and how the road will be upgraded to take care of transporter will be determined by the State Highway Department.

MR. MAFFEO: Have you contacted local landowners in the proposed new cable routes? **136**

LT. COL. WALSH: No, we have not.

MR. MAFFEO: Do you intend to? I mean before an actual

decision is made on the route?

MAJOR TAGGART: The proposal on the cable routes is that we have, as was described by Lt. Col. Walsh, various alternatives as to how that upgrade for our cable system could be accomplished. There are a very large number of landowners that could be touched by the total of that layout. So at the present time we don't have an intent to go out and discuss with each of those landowners that could be touched by all of the various alternatives. **136**

The selection of those alternatives is based -- the selection would be made by the program manager and is based on the technical need of the system plus the environmental effects that were outlined by Lt. Col. Walsh as to --

MR. MAFFEO: What kind of a time could someone expect then? How long would they know before the work is commenced?

MAJOR TAGGART: Well, there would be identification of those alternatives in, I would guesss, the 1984 time frame set. Is that correct, Col. Hickman? 1984 time frame. The precise date in which the cables will be in place is yet to be determined, but I think it's in the 1986 time frame.

COL. HICKMAN: Eighty-seven, I think.

MAJOR TAGGART: Eighty-six or '87. There is quite a considerable amount of time from the time there is a definition of the system to the time the construction activity would actually take place.

MR. MAFFEO: Is there a particular person that questions can be directed to, I mean other than a forum such as this, someone at the Base?

MAJOR TAGGART: Well, Col. Hickman is the Site Activation Task Force Commander, and I'm sure he would be happy to identify how you could get in touch with him at the Base with regard to the Peacekeeper Program. Capt. Mike McMullin is available in Cheyenne downtown to answer your questions also. If there is a specific question that you have in mind or how to address some particular agency within the Base, that could be identified.

MR. MAFFEO: Well, I just wondered if there was one sort of a liaison officer that would more or less -- one person to deal with?

MAJOR TAGGART: Yeah, Capt. Mike McMullin is the Peacekeeper liaison officer and is available in Cheyenne.

MR. MAFFEO: Okay, thank you.

MAJOR TAGGART: You can talk to him right now after the meeting.

COL. SMITH: Thank you, very much sir. Our next person with questions or a statement is Mr. Robert Lawrence, a Professor at Colorado State University, Department of Political Science. Good evening, sir.

372 MR. LAWRENCE: Thank you, Col. Smith. Rather than address questions to your panel, I would like to make two short comments regarding statements found in the Draft Environmental

Impact Statement. I'm quoting here from Page 1-6 at the top of the page. "Another general issue to emerge from scoping meetings was concern that deployment of the Peacekeeper Missile might induce a nuclear strike from the enemy in time of international tension."

Given the fact that by the time the MX is probably deployed, the Soviet Union will probably have a capacity to take out ten of our warheads of these fixed sites by expending only two or three of their own, it strikes me this statement understates the problem considerably, and a good deal further analysis should be given to this matter. **122**

On the same page, the second statement I'd like to comment is also found quoting again, "Some felt that the environmental impacts of a nuclear attack, particularly in the deployment area, ought to be included in the EIS period. The effects of war are speculative and lie beyond the scope of the Peacekeeper deployment and peacetime operations. They are therefore not dealt with in this document." Using the vernacular of the college students, this particular statment strikes me as an enormous cop-out. Thank you, Col. Smith. **37**

COL. SMITH: Thank you, very much sir. Our next speaker is a Mr. Alan Kirkbride, I believe it is, from Meriden, Wyoming. Good evening, sir.

365 MR. KIRKBRIDE: Good evening, thank you. I would like to make a few comments. I'm a cattle rancher, and live -- we're

in the north central part of Laramie County Wyoming. And I would like to make a few comments relative to what I feel impacts to my life and to my community and to my -- to my area of concentrated study. And I would also -- before I do that I would like to comment on one section on wildlife on Page 2-112 under Section 2.2.2 -- well, four 2's, and then a 4 and then a 2, and it's -- this statement is there, and if I understand it properly, referring to the big large game animals, "No laming, fawning or (inaudible) are known to occur in the area." And I live there and I'm outside everyday, and this is a fawning ground for both mule deer and pronghorn antelope, and on the range there. 1381

If I understand -- I believe if I understand what that statement has said, and I believe the EIS stated that it was from a Game and Fish statement or something, I would differ with that statement.

Now, I would like to then make one comment that I think that this -- the EIS Statement is complete in most areas. It seems remarkably deficient in the impacts to agriculture, agricultural operations and rural life. I would submit that the cumulative effect of the deployment of this missile system to the rural areas is negative. I would -- the beneficial effects that came from -- that were -- seemed to be in the human side that came out as the beneficial side was primarily due, as I remember, to economic, many jobs. 1100

And I would submit that agriculture is a noted segment

in addition to the few that were mentioned which will not benefit economically from the deployment of this missile system. Certainly I do not expect to in any way. I then had 13 additional points which have negative impact which were of concern to me, only one of which was covered at any depth in the statement. And I would ask that these all be considered when the final statement is prepared. 1100

As was earlier mentioned, shooting and no rustling of livestock. Let me -- before I go on, many of these are indirect results, and they're indirect results of increased human population in the area. And I would say further that a problem that we face here is that we have almost virtually pristine plains where I live which means that there are very few -- aren't many people, and it's pretty untouched. And many of the people that we encounter who come onto our land, many airmen, but also others, have never been in a rural setting before, some of them never in a rural setting, many from the east, many that are -- if there's not a house every five acres, it's probably public land.

Very little of it -- of the entire region of influence is public land. So we have a fraction of environment and we have people who don't understand it. A lot of this following list comes from that -- that the people don't understand there. Okay. We have shooting or rustling of livestock is one. Collisions with livestock. I -- we lose on the average -- we have at least one steer or cow per year who gets a broken leg in a collision 981

with a vehicle on a major road. That is not all Air Force traffic, but we don't know who it is. But these things happen the more vehicles you have.

There was comments earlier about the roads and dust problems. I believe I interpreted the statement to say that we can expect in the construction phase of deployment light vehicle traffic of 10 to 100 vehicles per day and heavy truck traffic 2 to 20 vehicles per day. So I -- certainly as a livestock owner I can expect more problems like that. 981

Litter. There are -- there's a litter problem anyway and the people who pick it up are me on -- the people on the ranch that really care about it, and a number of friends, very concerned sportsmen who help. And people add to this problem. Okay. 1098

Cable. If there are additional cable lines, there are installation hazards. I believe that's been previously mentioned. 1144

A very important one to me as far as personal safety is that rural roads are innately hazardous. They are not -- there are sharp hills in the roads. When you travel the gravel roads, you'll find there are always a set of well worn tracks down the center right over the roads. Only the most carefully cautious drivers get over the rise on those hills. My -- I have between seven and nine miles of gravel before I get to the highway. And the school bus travels there, my wife travels there, I travel there and my friends. I will have increased hazard in my life 981

due to people -- increased people in construction phase of this project or any other project. 981

Vandalism theft problems. Their -- ranching operations are not all concentrated in a few acres in this area so there are remote areas, and we do have those problems. There is vegetative disruption by four-wheeling and motorcycles at times. Once again people not understanding the nature of those fragile lands, and these are recreational uses. 505

There is a fire danger. The prairie fires are things that people won't -- that I didn't see mentioned anywhere in this study, but it's very real to the rural people. It's important to a livestock owner that gates be left as they were found. Our livestock gets out, mixed, can travel for miles. Once again people who don't understand -- if you can't talk to every construction person and every airman. They just don't know, and they will make mistakes. 1099 1097

There was mention of threatened species. In my view all wildlife and domestic animals are threatened when a major construction project is in an area like this. Raptors were mentioned. I would also mention non-raptors are shot at by recreationists shooting swallows on the cliff and things. These are rare instances that will be an impact. 1377

(Brief pause.)

I would request that something -- that there be a section -- perhaps we failed in the scoping hearings to direct it 100

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this way -- that there be a section related to the impact of the people who live amidst the sites and some of their problems and their anticipated impacts. I believe I did ask a question or two in there. If someone would care to respond, that's fine or ask me anything further, I'll be allowed to stand up here like I was an expert. 100

COL. SMITH: Could you repeat that question?

MS. KIRKBRIDE: Well I said something -- I don't know.

(Brief pause.)

Oh, I did mention that one section that I felt should be corrected. Thank you very much for your time.

COL. SMITH: Thank you, sir. Any response from the panel?

MR. HICKMAN: I would just like to say that we do have a section within the land used area where we have addressed some of the agricultural problems that we have foreseen. Primarily within this project we had seen very little removal of agricultural land. Generally as only -- a very small change if any in production of either crops or livestock, but I think you have brought up some very valuable points, and we will look into each of them and attempt to assess what the impact of the project would be on the agricultural industry.

MR. KIRKBRIDE: Thank you very much.

COL. SMITH: The next card I have is from Linda Kirkbride, also from Meriden, Wyoming.

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321 MRS. KIRKBRIDE: Thank you, Col. Smith. My question has to deal with the vote that just took place in Congress today. The MX funding for '84 fiscal year was approved by the vote of 217 to 208 which is nine votes. My question deals with if there -- there will be additional votes as this funds only the first 27 missiles. So as the votes come along and as the makeup of Congress changes, what will happen to Cheyenne, to the rural areas, to all the existing areas when the funding is stopped perhaps along the way because this is only a nine vote difference. It would only take five votes to change, and it could mean that you could get only 27 missiles funded, and that could be it.

CAPT. McMULLIN: Hi, Linda. As you well stated the House just tonight passed the appropriations bill for the entire House of Representatives, which included the production money for 21 missiles. The next step is for the Senate to go to the floor and pass or reject the appropriations bill for the same amount. 118

No one holds a crystal ball to project the future; however, we are very optimistic that with the passage of the action taken today by the House, the appropriations bill for MX, that the Senate will follow suit. And we anticipate that to take place by the 10th of November; that is the full House and Senate to go to conference and complete the appropriations bill.

The next step in the equation I suppose is since funding is done on a fiscal year basis, and we have to treat the acquisition money or the production money in each year, then as

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you stated we -- Congress in turn will have to appropriate -- or authorize and appropriate the expenditure of that money for the deployment of MX or the production of further missiles in the out years. It's hard to project what could happen, but we feel very optimistic that with the President's decision to deploy 100 Peacekeeper Missiles that the Congress will fund that not only in fiscal year '84, since we do have completion of the authorization bill which is now law, and we're just waiting for the final appropriations bill to be passed, we still feel fairly optimistic even in the out years to the completion of the project once the production lines are open and money has been appropriated that the funding will continue for the full deployment of 100 Peacekeeper Missiles. 118

Now, I'm not trying to be presumptuous and presume what Congress will do in the out years. Certainly they could change their votes, could limit the amount of money they appropriate for the production of those missiles, but it -- you know, it's just too hard. It would be premature on my part or any of us to speculate as to how those out years funding will occur. But we're fairly optimistic that in light of what has taken place thus far that the funding in the out years will be approved as well.

MRS. KIRKBRIDE: I just would submit that it could cause more problems in impact if only 27 were funded rather than the full 100, that it could be a far greater impact for the --

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especially the cities that are included.

CAPT. McMULLIN: You mean in terms of if we were to change our deployment plan from what we now currently envision as the deployment of 100 missiles to the deployment of a smaller number?

MRS. KIRKBRIDE: Yes, I think that just [illegible] 27 could really mess up a lot of people who had [illegible] full amount, and I think that's what the [illegible] indeed it does depend on Congress and the [illegible]

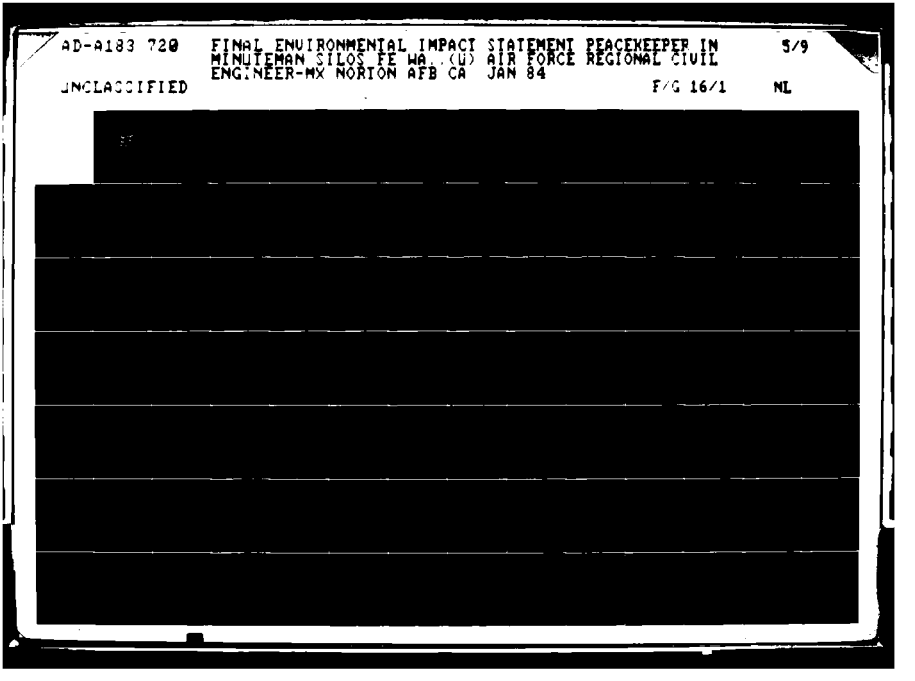
CAPT. McMULLIN: Sure

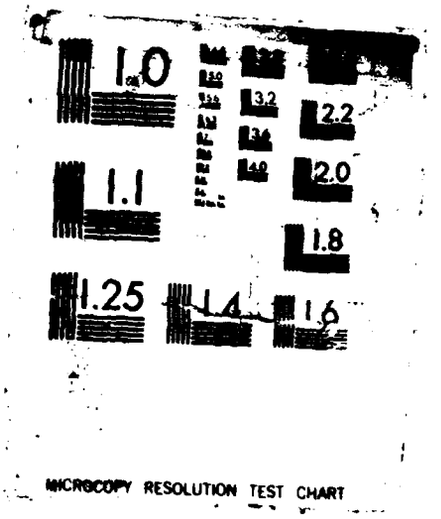
MRS. KIRKBRIDE: -- and that [illegible] you said it is too difficult at [illegible] but it is tied to arms control, and [illegible] much of a tenuous thing as [illegible] on, which included [illegible] has signed [illegible] it is tied to arms control [illegible] we should all wait [illegible] around the [illegible]

CAPT. [illegible] the President's [illegible] recommendation [illegible] as you [illegible] at full [illegible] or [illegible] 118

AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 5/9

UNCLASSIFIED F/G 16/1 NL




1.0
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MICROCOPY RESOLUTION TEST CHART

systems. So a lot of this yes, is to be determined by the on-going pursuit of arms reductions, and those outcomes could adjust the President's plan. However, the President has directed the deployment of 100, and that decision was approved by Congress in May of this year. But as I did explain the funding is a fiscal year basis each year. 118

MRS. KIRKBRIDE: And in the same light as this as we're going on this, if you just -- if the full amount were not funded, what happens to the existing Minuteman III? Will you -- you said that you'll need 600 additional people. Will you need the same amount of people no matter how many are going to be in place, and what are -- what is the role of the additional 600 people? Is it security, what? And then my -- another question is what will be the stepped-up security? Will you notice indeed an increased amount of security vehicles traveling around on our property and around my childrens' school, the vehicles around this area? I just wondered what the increased security measures would be. 128 143

CAPT. McMULLIN: Let's go back to the first question, and I'll try to remember them as best I can. You may have to help me to repeat them. If there is an adjustment and the President directs or Congress directs an adjustment to the deployment plan as has been decided upon, then obviously we would have to make some adjustments to our estimates. In other words, our analysis that was done to this point in time because since

that analysis was done based on the deployment of all 100 MX missiles, so we would obviously have to make some -- reevaluate and make some adjustments. Those could -- that reevaluation could change the estimates on the deployment figures or any of the other potential impacts that we have identified, and then obviously change the proposed mitigations to address those potential impacts.

Your second question regarding the security issue. What you're seeing now has been under work for some time in light of the Minuteman -- the existing Minuteman System to beef up or take necessary steps to increase our security requirements for the existing Minuteman sites. That is an on-going effort under the Strategic Air Command and security police who monitor our sites today to insure that they are safeguarded.

The other part of your question or the third question was regarding what will the additional 5 to 600 people that remain behind after the project is completed be doing? And they'll be doing several things. Part of those things are security, part are operational and maintenance of the existing -- or excuse me, of the Peacekeeper Missile System. So there's a variety of functions. It's not all security. There will be some increases to security personnel, but others will be maintenance type facilities, maintenance type personnel for maintaining the missile configuration. Did I address all your questions?

MRS. KIRKBRIDE: Yes, I just don't understand totally

why that large a number, but -- perhaps as it goes on. We'll see.

CAPT. McMULLIN: Well, if I can clarify a point, I would be happy to. The maintenance of the Peacekeeper Missile, although in some respects is similar to the existing Minuteman System, there are some differences.

MRS. KIRKBRIDE: Uh-huh.

CAPT. McMULLIN: And since we are -- it is a different system, and we need specialized trained individuals to conduct the maintenance work on those particular missile systems, the new missile systems. Then it requires or necessitates an increase in personnel. We will still have personnel working on the Minuteman System because what you will have here is a mixed wing of 100 Peacekeeper Missiles and 100 Minuteman Missiles each having their unique maintenance requirements.

LT. COL. WALSH: With respect to your initial question as it pertains to the adequacy of this EIS to look at if the Congress decides to build less missiles than we're presently proposing. Right now we are presenting the EIS and now the DEIS for the proposal before us; that is, 100 Peacekeeper Missiles. If Congress at a later date does make a change, we would definitely have to reassess the situation and may have to do a revised document to look at what the revised impacts are either from the boom/bust cycle of everyone coming in and then moving out so that we again can identify what mitigation actions needs to be taken

so that the full burden of that impact is not felt or imposed on the local population. But that will be a decision that will be made in response to any changes that come from Congress.

MRS. KIRKBRIDE: Yes, okay. Thank you, that's good, thank you. I have a couple of questions. What of the stress tests from your -- I was talking to an official out at Morrison and Knudsen last week in Boise, Idaho. And we were discussing concrete in the silos themselves. And I heard a comment from a local construction -- former construction worker that put in the missile sites 20 years ago, and he felt that the construction -- the concrete just wouldn't stand that and of course in placing of the new missile in the existing silos without quite a bit more concrete work. And of course we as citizens don't have any access to that kind of information. I just wondered if your stress tests have indicated that the concrete is adequate or if you will have to do a lot more concrete work? 132

CAPT. McMULLIN: The test and analysis work that we've done associate with the existing Minuteman III facilities that plan to receive the Peacekeeper Missile System can easily accomodate the Peacekeeper Missile without any modifications to that concrete that's within the silo. So we have no plans to change the structure, to dig out the silo, to add additional concrete to that existing silo. Does that answer your question?

MRS. KIRKBRIDE: Well, it answers the question. I don't know if it answers this man who worked on them 20 years ago

He didn't feel like -- under certain conditions he felt like the concrete shouldn't have been poured. That's -- that was just his opinion, and he'll probably be in Cheyenne too. I was just curious.

Also then as the transporter comes out, will there be any -- will you have to change any power lines or will that -- will the power lines be endangered as far as their height level?

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COL. HICKMAN: The analysis that we have done indicates there should not be a problem. The transporter height is -- the running height is 14 feet 8 inches, which is about a foot higher than a normal semi trailer that you see on the road. We don't see a problem with power lines.

MRS. KIRKBRIDE: Okay. And then I might add to the other impact that's -- that you've studied here at School District No. 2, the impact of that, and I don't see any school district members here this evening, there may be and I haven't seen them, but I'm not sure that that has been adequately addressed, that there could be more impact to School District No. 2 than is indicated.

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CAPT. McMULLIN: Is there a specific concern or comment that you would like to make referring to School District No. 2?

MRS. KIRKBRIDE: The same that would be -- the same that would be addressed to School District No. 1 --

CAPT. McMULLIN: Okay.

MRS. KIRKBRIDE: Mostly space and size and just additional impact.

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CAPT. McMULLIN: Mr. Hickman?

MR. HICKMAN: The analysis of School District No. 2 as well as some other school districts within the area were done within a separate study, which is currently part of the technical reports for the DEIS. The Wyoming/Nebraska socio economic study was both a base line and impact analysis by jurisdiction within the six-county area of the project. And in that study there was a parallel study of all of the school districts involved.

When we got to the DEIS and to a level of deciding what is in the area of concentrated study, it was the small change that kept School District No. 2 from being included. But we did both the base line study analysis on the facilities, of the programs and faculties and plans that are currently underway for the district. So we have done that work, and it's in a separate document. I'd be happy to give you reference to it or we could provide you with a copy of it.

MRS. KIRKBRIDE: Thank you very much.

COL. SMITH: Thank you very much, Ma'am. The last card that I have is from Gary Ruzicka of the Catholic Church here in Pine Bluffs, the Pastor of the church. Father Ruzicka?

(Brief pause.)

Apparently no longer present.

(Brief pause.)

Apparently no longer present.

That completes the cards that I have here before me. Are there any questions, statements, et cetera that have been generated by the comments or questions? If you could raise your hand and be recognized and move to the microphone or to the podium, wherever is most convenient, I'll certainly take additional statements, questions at this time. If you could state your name if you would like to and any group that you represent, we'd appreciate it. Any other questions, any statements or comments?

(Brief pause.)

I don't see any hands -- oh, excuse me, we have one hand I guess.

328 MR. ANDERSON: I'm Theran Anderson from Albin. I have a couple things I think maybe need to be addressed. In the road network on construction phases we're looking at essentially major improvements in the roads, at least the ones I drive on, the schedule of that construction would have to be moved out of our period as an agricultural community during our peak harvest season, and that would run anywhere from approximately the first of July on into at least the middle of October because if the roads are tied up, and we're trying to move our commodities, there could be king-sized problems in that area.

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Another thing that I think should be addressed is the fact that the Air Force personnel should maybe be given a class that the fact that if a land doesn't have a guard fence around

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it, it's public property. Alan was talking about this a little bit. We've run into it in our area. Some of my neighbors -- one of my neighbors had Air Force personnel out running military maneuvers in his wheat field. It didn't make him too happy. They seem to think that as long as it didn't have a fence around it it was public property and they can do anything and everything they wanted. As long as I'm paying taxes on my land I expect due consideration that it's mine and everybody else keep their hide off.

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Also I would like to address the Air Force to the extent that a lot of us in this area, private property owners would like you guys to remember that you are guests in our community. A lot of us feel that you are uninvited guests, and you're unwanted guests, and that you should act accordingly concerning all your construction and all of your activities. Thank you.

COL. SMITH: Thank you, sir. Do we have any other questions or comments? Yes, sir?

383 DR. McCONNELL: I'm Dr. Douglas McConnell from Pine Bluffs here. I would just like to make a couple statements. We are proud of the Air Force and what it's done for America. We're just a small segment of our great United States, but I think the item that has concerned most of us is whether or not we have a nuclear war, but the impact in our environment is how fast will the Government move if we have a problem? If we have a problem

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with poaching, it's happened gentlemen, we have a problem with livestock or agriculture or what, how fast will you move to -- are we going to have to tie up the courts? Do we have to have environmentalists? Mayor Conner mentioned about the highways to get south of Pine Bluffs. Do you have to go through all the panels and litigation or is someone just going to be in authorization to get right at it or what do we do? That's my main concern from my part is really what -- what quick avenues or channels that you could enforce that would speed up any process to alleviate problems in our little community here? Thank you very much. 88

LT. COL. WALSH: In the DEIS document itself we have proposed several or many mitigation actions, some of those responsibility of the Air Force to undertake, but many are a venue of options for the local governmental -- governmental entities to choose from. As I indicated during my initial briefing, we anticipate to put a mitigation plan together which would be a cooperative effort between the Air Force and the governmental entities for both Nebraska and Wyoming. The intent is that these mitigation actions will be implemented in a timely manner. And that's why we have been working very diligently with the states to build that plan so we can go to the appropriate source whether it be federal funding or other in order to get it in a timely manner so that there again the total burden is not borne by the local -- by population.

DR. McCONNELL: Thank you very much.

COL. SMITH: Thank you, Doctor. Do we have any other questions, comments from members of the audience?

(Brief pause.)

I don't see any further hands at this point. How about comments from panel members, anything that any member of the panel would like to add?

(Brief pause.)

Apparently not. And once again, any additional questions or comments from members of the audience?

(Brief pause.)

I see nothing there either. Ladies and gentlemen, we thank you very much for your attendance here this evening, your interest in the project. We appreciate your comments and your questions. Good evening. Thank you again.

(Whereupon the proceedings were concluded at 10:01 p.m.

. . . . .

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I further state that I am not agent, attorney or counsel for any of the parties hereto, nor am I interested in the outcome thereof.

VALERIE BAHR
Registered Professional
Reporter

Frontier Reporting Service

PEACEKEEPER IN MINUTEMAN SILOS

ENVIRONMENTAL
IMPACT STATEMENT
PROCESS

TRANSCRIPT OF HEARING PROCEEDINGS

PURSUANT TO NOTICE the following Public Hearing took place on Wednesday, November 2, 1983, at 3:00 o'clock in the Civic Center, Cheyenne, Wyoming, before a team of specialists and experts including: Col. Warren Hickman, Site Activation Task Force Director at F. E. Warren Air Force Base; Lt. Col. Reese Padfield, Assistant Chief of the Environment and Integration Division of the Ballistic Missile Office at Norton Air Force Base, California; Maj. David Taggart, Staff Judge Advocate of the Civil Engineer's Office at Norton Air Force Base, California; Capt. Mike McMullen, Headquarters Peacekeeper Liaison Officer, Cheyenne, Wyoming. Also Mr. Fred Hickman, Human Resource Director for the URS Program, San Bernardino, California; and Mr. Dick Kramer, Natural Resource Director for URS, San Bernardino, California.

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PROCEEDINGS

(Whereupon, the following proceedings occurred on Wednesday, November 2, 1983, at 3:00 o'clock p.m., in the Civic Center, Cheyenne, Wyoming.)

COL. SMITH: Good afternoon ladies and gentlemen. Welcome to this, the second of seven scheduled hearings in Wyoming and Nebraska on the Draft Environmental Impact Statement for the Peacekeeper in Minuteman silos.

My name is Allan Smith, the trial judge. I will be the hearing officer for this session. My role is simply to conduct the hearing. I have not been involved in the development of the Peacekeeper project. I will not be making any recommendations or decisions concerning it.

First on the agenda is an explanation of the Peacekeeper project and the draft statement by Lt. Col. Peter Walsh, our briefing team chief. Following his presentation statements and comments from government officials will be received. We will then take a short break. After the break statements and comments and questions from representatives of organizations or individuals will be accepted. We ask all speakers to limit their comments and statements to five minutes. Questions will be answered by our team of experts and specialists. The hearing is scheduled to conclude at 6:00 p.m.

(Statement - Col. Smith)

To provide the greatest opportunity for all who wish to speak or to present comments or questions we request that you fill one of the cards out that are available in the lobby. Speakers will be recognized from the floor only if time permits and after all of those registered to speak have had the opportunity. If time does not permit you an opportunity to speak here in the auditorium today, you certainly may submit written comments or statements. This may be done by presenting such statements at the registration desk in the lobby or by mailing them to the address on the hearing handout. That address will also be on the screen at later times during the hearing.

A court reporter is present and verbatim transcripts will be made of the entire hearing. A videotape of the proceedings is also being made as a back-up to the transcript and to insure that the record is accurate and complete. Capt. Pat Maloney is present at the back of the room to handle any special questions that the press may have.

We are now ready to begin with the briefing on the Peacekeeper project draft statement by Lt. Col. Peter Walsh.

STATEMENT

BY LT. COL. PETER WALSH:

Good afternoon ladies and gentlemen. I am Lt. Col. Peter Walsh, Director of the Environmental Planning

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Division for the Air Force Regional Civil Engineer at Norton Air Force Base. In this position I am responsible for the preparation of the environmental impact statement for the Peacekeeper in Minuteman silos project. Today I intend to summarize the major findings of the Draft Environmental Impact Statement issued on October 14th for the project. However, before reviewing the findings I shall provide the background and context for the statement. Specifically, I shall cover the following subjects: First, I shall review the events leading to the Presidential decision to deploy the Peacekeeper in Minuteman silos. Second, I shall briefly describe the project. Third, I shall discuss the scope of the environmental impact statement. Next, I shall discuss the process and methods used in the preparation of this statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final environmental impact statement. The same briefing will be presented at all public hearings so everyone will receive the same information.

In accordance with the Presidential decision of April 19, 1983, the Air Force plans to deploy the Peacekeeper missile system within the 90th Strategic Missile Wing at F. E. Warren Air Force Base near Cheyenne, Wyoming. In making this decision the President was adopting the

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recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the President on January 3, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

The project described by the President entailed replacement of one hundred of the existing Minuteman III Missiles with one hundred Peacekeeper Missiles in the 400th and 319th Strategic Missile Squadrons located near Cheyenne. In order to implement this decision the following actions are required: Modification of existing facilities and construction of new facilities at F. E. Warren Air Force Base; modification of one hundred missile launch and ten launch control facilities in the aforementioned squadrons; installation of five additional buried cable systems connecting the two squadrons, and upgrading the existing deployment area road network.

The project will commence in early 1984, soon after the final environmental impact statement is filed. Initial operational capability, defined as the first ten operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989. Operations of the Peacekeeper will be similar to the Minuteman system. The major differences are in the transport and in placement of the missile. The Minuteman stages are transported fully

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assembled and then placed in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle and placed in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman system. Similarly, the Peacekeeper system will be as safe, if not safer, than the Minuteman system. An accidental burning or detonating of a Minuteman has never occurred during any of its past nineteen years of deployment. The Peacekeeper system has benefited from this field experience as well as improvements in technology. Development and use of insensitive high explosives in the Peacekeeper re-entry system represents an important safety improvement. Insensitive high explosives are particularly effective in insuring that ignition occurs only upon direct command. The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than one in ten trillion.

Given the Presidential decision and its implementation requirements, the Air Force prepared the Draft Environmental Impact Statement in accordance with the Council on

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Environmental Quality regulations. The statement assesses the impacts of the deployment and peace time operation of the system, alternative project elements and the no-action alternative of retaining the existing Minuteman III missiles. This statement does not cover the analysis of alternative basing modes, nor deployment locations for the Peacekeeper missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the "Jackson Amendment", exempted such analysis from the requirements of the National Environmental Policy Act.

Likewise, analysis of other basing modes such as super hardening of protective structures, deep basing and ballistic missile defense are not included in this statement. They are excluded because, first, they were not part of the President's decision; second, the Air Force does not intend to propose any of them in the reasonably foreseeable future; and third, Peacekeeper deployment is not connected to any of these potential systems.

Furthermore, the environmental impacts of nuclear attack are not analysed in the statement because the effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peace time operation.

Following the President's decision and subsequent to approval by Congress, a notice of intent to conduct the

(Statement - Lt. Col. Walsh)

environmental impact statement process and the schedule for scoping meetings was published in the Federal Register on June 13, 1983. The scoping meetings were held between June 27 and July 8, 1983. Public meetings were held in Cheyenne, Pine Bluffs, Torrington and Wheatland, Wyoming; and Kimball and Harrisburg, Nebraska. Additional meetings were held with federal agencies in Denver, Colorado, and Kansas City, Missouri, and with Nebraska state agencies in Lincoln, Nebraska. The purpose of these meetings was to obtain information for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental resource in a two-step process. Study areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project. Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within

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the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analysed within both the regions of influence and the areas of concentrated study. Four categories formed the framework for impact analysis. They are area, timing, intensity and significance.

Area is defined as either site, local or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site, and region is the previously discussed region of influence for each resource. Timing is defined as either short term or long term. Short term is the period from commencement of work until the system is fully operational. Long term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission. Intensity is defined as negligible, low, moderate or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project. Significance designates an impact which either requires heightened attention during project planning or requires extensive action to mitigate.

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Upon completion of the analysis, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages. A set of thirteen environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the documents was published in the Federal Register on October 14th. On that date the document was also available at libraries and federal, state and local agencies within the study area.

In this review I shall present a description of each resource study. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing and intensity of adverse impacts. Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rational for such judgment will be given. You may follow my presentation by referring to the table on the inside of the handout made available to you as you entered the auditorium.

Employment demand describes the available regional labor force which may be used by the project, and the demand for non-local labor which may result in the immigration of workers and their families.

The analysis indicates a short and long term,

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beneficial effect on the City of Cheyenne and the region of influence because of increases in employment and income. During the peak employment years 1986 and 1987, approximately 3,300 persons will be employed as a result of the project. There will be about 1,800 direct and 1,500 indirect jobs. Approximately 1,000 of the 3,300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements would be filled through either immigration or weekly commuting. When this system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demands. Local, short and long term beneficial effects result from potential increases in sales value and rental income due to increased housing demands in the Cheyenne urban area and the City of Kimball. There is, however, an opposite effect on the consumer, particularly those on fixed incomes and first time home buyers.

The analysis indicates a local, short term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the City of Kimball exceeds the projected net vacancy rate. Also, the market response would

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have to exceed the highest historical annual production level. The analysis further indicates local, long term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as out migration occurs during 1986 through 1990.

The local, short term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

Public finance. Public finance describes the budgets, fiscal resources and obligations of all major governmental entities including school districts and urban service areas.

The analysis indicates local, short and long term beneficial effects because of additional revenue to governmental entities due to increased sales and property taxes and other taxes and fees. The analysis further indicates local, short term moderate impacts because many local governmental entities would face potential budget imbalances. This would require either an increase in revenues or a reduction in service related expenditures during peak project activity. The analysis also indicates local, long term low impacts because during the operational phase these increased expenditures may be offset by increased revenues.

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Construction resources. Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, structure steel, reinforcing steel and steel rail.

The analysis indicates that regional, short term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials. The analysis further indicates a regional, short term low impact resulting from the projects increased demand on regional production capacities of cement, aggregate, ballast, asphalt and roofing.

Social well-being. Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions and selected indicators of behavior. A local, short term beneficial effect is anticipated due to the improved economy.

The analysis indicates local, short term moderate impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with the immigration of population.

The analysis further indicates that the local, short term impacts were judged significant because the

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population sub-groups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job seekers, adolescents, and fixed income elderly.

Public services and facilities. Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal justice, fire protection, health care, human services and libraries.

The analysis indicates local, short term moderate impacts. These impacts are due to a seven percent increase over what is projected for the student population without the project in Laramie County School District No. 1 in the peak year, 1987. Also contributing to the impacts is the need for additional fire fighters, vehicles and space for the City of Cheyenne Fire Department; the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne; and increased demands in health care and human services.

The local, short term impacts were judged significant because of over crowding of the school system, the potential for a decline in safety due to inadequate traffic

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control, and the potential for human service needs that are unsatisfied.

Utilities. Utilities describes water treatment and distribution systems, waste water systems, sod waste systems, storm water facilities and telephone service.

The analysis indicates that site, short term low impacts are a result of a further overloading of existing sewer downstream of F. E. Warren Air Force Base sewer and from the need for additional on Base telephone equipment. Local, short term low impacts result from the further degradation of the performance of existing waste water systems for the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and storm water facilities in the Cheyenne urban area as a result of new land development in the region.

The local, short term impacts were judged significant because the overloaded operating conditions of waste water systems in the Cheyenne urban area and Torrington will be aggravated.

Energy resources. Energy resources includes the supply and distribution systems for electrical power, natural gas, petroleum fuel and coal.

The analysis indicates local, short term moderate

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impacts as a result of the need to expand the capacity of a local electrical substation serving F. E. Warren Air Force Base by about 40 percent. Local, long term low impacts result from increased energy demands. The analysis also indicates regional, short term low impacts as a result of the depletion of the non-renewable energy resources from the construction phase of the project. Regional, long term, low impacts are a result of the depletion of non-renewable energy resources by Peacekeeper operating personnel.

Transportation. Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design and operation of roads, railroads, aviation facilities, public transit and pedestrian and bicycle facilities. A long term beneficial effect is anticipated due to the improvements to roads and bridges at the site, local and regional levels.

The analysis indicates site, short term low impacts as a result of construction activities on and near roads in the deployment area. Local, short term, moderate impacts are indicated as a result of reductions in the level of service at thirteen of twenty-six impact intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F. E. Warren Air Force Base

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Randall Avenue gate due to the influx of construction workers and materials onto the Base. The analysis further indicates regional, short term low impacts as a result of existing capacity constraints and increased demands at Cheyenne Airport.

The site, short term low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternative travel routes. Local, short term moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land use. Land use comprises both urban land uses in developed communities where population immigration is expected, and rural land use in the deployment area where direct impacts from project development would occur. A local, long term beneficial effect may occur from the infill of vacant areas with in the city boundaries of Cheyenne and Kimball.

The analysis indicates site, short term low impacts are a result of temporary interruption of agricultural land use during cable trenching. The site, low term low impacts are a result of restrictions on residential land use within

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explosive safety zones. The analysis also indicates local, short term low impacts are a result of the under-utilization of land developed to support mobile homes beginning in 1987 as out migration begins. Local, long term low impacts are a result of the continuing under utilization of land developed to support mobile homes.

Recreation. Recreation includes regional, resource spaced recreation, which is related to federal, state and other lands offering rural, outdoor recreational opportunities and local, user-based recreation, which is related to municipal and county owned parks and facilities within urbanized areas.

The analysis indicates local, short term moderate impacts as a result of increased demand for park land, facilities and staffing. The analysis also indicates local, long term low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation systems, requiring additional expenditures for operations and maintenance.

The analysis further indicates regional, short term moderate impacts primarily as a result of increased demand at Medicine Bow National Forest and Curt Gowdy, Glendo and Guernsey State Parks. These regional impacts become low in the long term due to reduction in the number

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of users when out migration occurs.

Local, short term moderate impacts were judged significant because of the need to seek funding outside of the normal budgetary process in order to provide additional local park land and recreational facilities. Regional, short term moderate impacts were judged significant because the additional use of regional recreation facilities will exacerbate an existing over crowded situation thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

Cultural resources. Cultural resources include four separate elements: Paleontological, prehistoric, historic and American Indian cultural resources.

The analysis indicates site, short term moderate impacts as a result of ground disturbing activities associated with the Peacekeeper deployment that may affect historic and prehistoric sites. The analysis also indicates site, long term low impacts as a result of the use of buildings at F. E. Warren Air Force Base currently listed on the National Register of Historic Places.

Visual resources. Visual resources includes scenic resources and the visual environment as well as any valuation of the visual quality of the region.

The analysis indicates site, short term low impacts

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due to clearing of vegetation and grading activity during construction.

Water resources. Water resources include ground water hydrology and quality, surface water hydrology and quality, water use and demand and constraints on water use.

The analysis indicates site, short term low impacts at F. E. Warren Air Force Base, launch facilities and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology. Site, long term low impacts are a result of permanent changes to the storm water runoff characteristics. The analysis also indicates local, short term moderate impacts because induced water demand exceeds the projected capacity of the existing delivery system for the Cheyenne urban area.

Local, long term low impacts are predicted because of increased water demands, increase surface runoff and increased erosion and sedimentation in the Cheyenne urban area. Regional, short term low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development. The local, short term moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

Biological resources. Biological resources includes

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vegetation, wildlife, fisheries and unique and sensitive habitats.

The analysis indicates site, short term moderate impacts as a result of potential immediate disruption, by construction or modification activities, of riparian vegetation and wildlife habitats.

The analysis also indicates site, long term moderate impacts as a result of construction activites that may potentially distrupt trees and shrubs in riparian and wet land habitats that have long recovery periods. The analysis further indicates that there are regional, short term moderate impacts. These are the result of general recreational pressures, poaching, dog kills and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park. Regional, long term low impacts are a result of the random shooting of the Swainson hawk and other birds of prey.

The site, short term moderate impacts were judged significant because of the limited extent of riparian and wet land habitats. The site, long term moderate impacts were judged significant because of the long recovery periods of the riparian vegetation. Regional, short term moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased

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human activity on big game in areas of concentrated recreation pressures. Regional, long term low impacts were judged significant because of concerns over declining populations of some species of birds of prey.

Threatened and endangered species. Threatened and endangered species include plants, wildlife and aquatic species which are protected by federal law as threatened or endangered. Also included in this category are state protected rare, threatened or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because of special state concern.

The analysis indicates site, short term high impacts as a result of the disturbance of the habitat of the Colorado Butterfly Plant and the Wooly Milkvetch. Site, high impacts will continue in the long term as a result of the loss of habitat for the Colorado Butterfly Plant. The analysis further indicates regional, short term low impacts as a result of the potential for random shooting of the Bald Eagle and accidental catching of the Greenback Cutthroat Trout. Regional, long term low impacts are a result of the continuing potential random shooting of the Bald Eagle.

All of these impacts were judged significant because of the Bald Eagle and Greenback Cutthroat Trout are federally

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listed in endangered species. Also, the Colorado Butterfly Plant is categorized as a Category 1 species by U. S. Fish and Wildlife Service and the Wooly Milkvetch is listed as rare by the Wyoming National Heritage Program.

Geologic resources. Geologic resources include geological hazards, energy and mineral resources including aggregate and soil resources.

The analysis indicates site, short term low impacts as a result of the potential for soil erosion during construction activites. The analysis further indicates local, short term low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading. The analysis also indicates local, long term low impacts resulting from the need for aggregate resources for road maintenance.

Noise. Noise analysis includes vehicular, air and railroad transportation and construction activity.

The analysis indicates that the impacts will be negligible.

Air quality. Air quality describes the effects of project construction, operation and related transporation activities on future air quality.

The analysis indicates local, short term low impacts. These are due to increases in carbon monoxide levels from

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increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a result of construction activities.

Alternatives. As previously discussed, project alternatives were analyzed. These analyses focused on alternative road configurations, cable routes and staging areas. The analyses has demonstrated that for most of the resource areas, the level of impact is either negligible or low and not significant and does not vary within each of the three sets of project element alternatives. For four resource areas, transportation, land use, cultural resources and biological resources, there are variations in the level of impact among alternatives. I shall summarize these.

As shown on this slide, three alternative egress routes for transporting Peacekeeper stages from the base were considered. Alternative R-2, which is the proposed action, is designed to allow all northbound stage transported travel to exit the base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack Bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road Br[illegible] clearance problems, and the egress of the stage transporter at the Central Avenue

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interchange and at the Missile Drive interchange to travel north or south.

Alternative R-3 involves providing stage transporter access to Interstate 80 by Round Top Road which would require new on/off ramps at Interstate 80. Access to the north would still be via Interstate 25 near the Central Avenue interchange.

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have the low impact to transportation because it involves a longer length of road upgrading, particularly those off base, in addition to new on/off ramps at Interstate 80. This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Round Top Road may tend to stimulate urban development west of F. E. Warren Air Force Base and would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transporter route has the potential for intersecting cultural properties eligible for the National Register of Historic places. In addition, all three alternatives have a high and significant impact on the habitat of the Colorado Butterfly Plant because

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of potential disturbance during the construction phase of the project. This impact was judged significant because of the U. S. Fish and Wildlife Service's Category 1 classification of the plant species.

For the project, five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corridors have been identified for environmental analysis.

Three alternatives follow overland routes; two of these follow easements previously obtained by the Air Force for communications cables. One alternative follows an existing road right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way.

Impacts among the alternative cable paths did not vary appreciable with the exception of the land use, cultural resources and biological resources. The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives has a potential for high impact to cultural resources. This is due to the documented presence of archaeological sites in the area which the cable will traverse and the high probability

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that these routes would destroy additional, presently unrecorded sites. The remaining four routes have been assigned a low or moderate impact based on the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing critical raptor, riparian or aquatic habitats. Four of the seven alternatives would have moderate impacts, while the other three would have low impacts. The differences are due to the expected frequency of encountering the critical habitats. These impacts were judged significant because of the limited areas of these habitats.

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center. The proposed action would have staging areas located on the Base and in Cheyenne, Wyoming, and Kimball, Nebraska. An alternative would have temporary support areas only on the Base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered do not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the

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proposed action. That includes staging area in Kimball because of the potential of congestion on community roads. Similarly, impacts on cultural resources would be low for the proposals that includes staging areas on the Base because of the presence of prehistoric and historical cultural resources.

In conclusion, the Draft Environmental Impact Statement projects beneficial impacts in employment demand, housing, public finance, construction resources, social well-being, transporation and land use. It further predicts, that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transporation, recreation, water resources, biological resources and threatened and endangered species.

To the extent practicable, standard practices that could avoid, reduce or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures could be used to reduce impacts that have been identified. The analysis conducted has identified many of the mitigation options that are available to reduce impacts. For example, these could include requesting funds through existing impact aid to school districts for Laramie County School District No. 1. The Department of Defense and Wyoming and Nebraska government entities have agreed to

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enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense which will mitigate adverse impacts resulting from the project.

The statements, comments and questions provided during the public hearings and written comments postmarked by November 28, 1983, will be analyzed. After the close of the comment period, the Air Force will review and evaluate all inputs to determine how they should be responded to and for revisions to the analysis contained in the draft statement. The completion of this work will result in the development of the final environmental impact statement to be released by January 31, 1984.

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this afternoon.

This completes the briefing portion of the hearing. I shall now turn the program back to Col. Smith.

COL. SMITH: Thank you.

I would now like to introduce the team of specialists and experts that we have here to respond to questions today.

First we have Col. Warren Hickman, who is the

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the Site Activation Task Force Director at F. E. Warren Air Force Base; Lt. Col. Reese Padfield, Assistant Chief of the Environment and Integration Division of the Ballistic Missile Office at Norton Air Force Base, California; next is Maj. David Taggart, the Staff Judge Advocate of the Civil Engineer's Office at Norton Air Force Base, California; next is Capt. Mike McMullen, Headquarters Peacekeeper Liaison Officer here in Cheyenne, Wyoming. Then we have Mr. Fred Hickman who is the Human Resource Director for the URS Program, San Bernardino, California. Finally we have Dr. Dick Kramer who is the Natural Resource Director for URS also in San Bernardino, California.

Those are the team members that we have to respond to questions here today. We would now like to turn to some of the elected and other public officials who are present who desire to make statements.

First, we would like to welcome the Mayor of Cheyenne, His Honor, Don Erickson, Mayor of Cheyenne. We have two microphones, I might add, in the center of the auditorium and back there in addition to the two speakers if you would find that more convenient. They may come to the stage here and speak from the podium.

182 MAYOR ERICKSON: Good afternoon, ladies and gentlemen and gentlemen on the panel. It is good to have you

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back in Cheyenne. When F. E. Warren Air Force Base was first announced as the base of the deployment for the Peacekeeping missile, heated debate came to Cheyenne relative to the merits and demerits of modernizing our ICBM's in our backyard.

I have consciously and intentionally avoided public debate on the pros and cons of the Peacekeeper. The people of Cheyenne deserve a city government that hears and who are thoroughly committed to managing the impact, whether it be from the private sector or from the federal government. Our objective is to fully prepare for the consequences of the impact and to recognize both the beneficial and adverse impacts, and to mitigate adverse impacts as thoroughly as our local, state and national resources will permit.

Personally, I support, and I would like to make this statement very strongly, that I support the superior national defense and security system to maintain such posture here and abroad. At this point my message to the Department of the Air Force and to the people of Cheyenne has been, and continues to be, supported by the decision of our President and the Congress of the United States. I further have instructed city officials to work closely with the Air Force and its consultants in an atmosphere of cooperation, an atmosphere of dialogue and exchange and not blind acceptance

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of the URS Bergar and its observations and recommendations.

A similar charge was given to my impact committee composed of a staff of knowledgeable citizens. These teams were also instructed to remain neutral on the MX issue. I can unequivocally report that the dialogue and exchange has been intense and a concensus has been reached more often than not. I hope that the Department of the Air Force will recognize our heritage and values and respond accordingly to our impact concerns.

Gentlemen, the City of Cheyenne -- or actually the whole population from the point of deployment for the Peacekeeper -- however, our community's capability to respond effectively to the stress on its structures such as water, sewer, streets, schools, et cetera, will be severely hampered without justifiable financial aid, and technical assistance throughout the boom and bust cycle. Last week Air Force officials assured me that my impact committee and its review and comments through the Wyoming, Nebraska socioeconomic impact study would append the environment impact statement. Such an inclusion reduces the urgency for me to make additional comments at this hearing. Shortly, however, a final AEIS will be published and presented to Congress. I would like to reinforce a few points and respectfully request that they be considered in the current and future

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deployment plans.

First, rejection of the alternative, which assumes 60 percent of the impact population will move into the mobile homes south of the City of Cheyenne. The location of those units in south Cheyenne presents a major interstructural problem. The concensus coming out of my impact meetings is calling for dispersal of housing throughout the environs of Cheyenne and the region. Second, establish a mechanism, a monitoring mechanism, to delete -- excuse me -- to detect human service delivery needs and social structural changes to our heritage and values. Thirdly, attention to the down side of the boom and bust cycle. Although the EIS does not ignore the down side, there is a clear tendency to identify long term impact as not significant. Fourth, impact on the public financing and provisions of services are both short and long term. Cash flow will lag behind the service demand, and since sales tax revenues have a short lag time from the point of sale to public office, the Air Force should require all its contractors and subcontractors to obtain a Wyoming Sales Tax License.

I think it goes without saying that we expect every effort to utilize local and Wyoming contractors first. Fifth and finally, greater emphasis to local hiring. More attention can be given on the part of the Air Force and its

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contractors to hire local people to fill construction, assembly and check-out jobs and even technical positions. Short term training by Laramie County Community College can help prepare a large number of young adults for these jobs. I am pleased to note, as my final comment here is, that through the last five to six months, in working with consultants with the Air Force, our concerns have been addressed not all to our liking; however, there has been a response. This latest issue that I just brought forth about training our local people to meet some of the job requirements, we're going to have a meeting tomorrow on that very issue and try to look at the possibilities for the community college to be involved.

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I appreciate the privilege to have this opportunity to be your first speaker, and there will be additional people here in the audience who are represenatives of the impact team that will have comments for you and maybe some questions as well.

Thank you.

COL. SMITH: Thank you very much. We certainly appreciate your comments.

The next speaker that we have is Mr. Thomas Kilty, who is Chairman of the Housing Subcommittee of the impact team.

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Mr. Kilty?

226 MR. KILTY: Thank you, Mr. Chairman.

My name is Tom Kilty. I reside at 7306 Yellowstone Road here in Cheyenne. As you indicated, I'm appearing today as a representative of the impact committee that Mayor Erickson established. Specifically, I'm serving as Chairman of the Subcommittee on Housing. We intend to provide you with a brief oral statement at this time. We also intend to have written statements containing more information on the points we mentioned prior to the deadline for public comment.

First of all, generally we believe the problems associated with housing have been understated. Particularly with respect to temporary housing, mobile housing, the availability of capital for certain types of housing and the constraints of housing in certain areas of the community. Such concerns about specific draft materials appears to suggest that present regulations, ordinances and elements in the Cheyenne area development plan, the land use plan and so on, be modified and even solved in order to expedite development.

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We believe that existent plans and processes should be followed to the letter so that even impact development will proceed in accordance with community

(Statement - Tom Kilty)

desires and in an orderly manner.

The Housing Subcommittee believes that a dispersal approach to the housing impact is preferable to any plans that would concentrate or impact in one of two areas of community. I am grateful that the Mayor made mention of this fact as well. Concentration, we maintain, would destroy the objectives in the Cheyenne Area Development Plan and adversely affect the capital improvement plan of the community and obscure the development of reasonably priced housing in the Cheyenne and Laramie County area. 324

Four, the committee would support the proposal to have the primary contractor construct a facility to construct one or more man-camps -- that's my term for lack of a better one -- if it could be designed to serve a worthwhile purpose later such as a senior citizens' facility, a junior college, dormitory, emergency medical center or the like. 320

This will relate to comments on page 3-185, Mitigating Measures of the DEIS. The contractors should be required, however, to redecorate and refurbish the facility for community use at a later date or if ongoing use cannot occur to the level of the site then to restore it to its original condition.

There are some elements of plan that we feel do not have sufficient information and I notice in the Executive 148

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Summary, for example, that there is reference made to fifteen building projects which will take place on Warren Air Force Base in conjunction with this new missile system. We don't know much about that, so it's hard to comment. We think it's a significant impact on the community. One of the things that we hear about, for example, is a proposal to do something with water and housing, redistribution of water and housing or any other housing on Warren Air Force Base that it be phased so that the work will not further aggravate housing problems within the community that we will have to solve. In this report we feel not enough attention has been given to plans to improve numerous facilities at Warren Air Force Base. Aside from the actual modification of the missile sites that this work apparently will be significant and that decision makers be informed of these projects so that we can plan for secondary impacts. 148

Sixth, the reports that have appeared to date place heavy emphasis on mobile housing solutions to the housing impact. The Mayor talked about the 60 percent being targeted for the south Cheyenne area, the south side areas, and mention is made of 762 mobile housing park spaces or lots being made available. These comments overlook, in large measure, the problems of financing mobile home parks and subdivisions and public utilities required for such 327

(Statement - Tom Kilty)

development.

Seven, we are very concerned about competition for the materials skilled personnel need to build a weapon system and the housing that will be needed in this community elsewhere. We don't feel that this problem has been reviewed adequately. We feel it's going to be a problem. We urge the military and the federal government officials to get together with local officials just as soon as possible, perhaps in the nature of a task force, to identify those commodities that will be in shortest supply and to devise some sort of measures for dealing with this particular problem, because I think it's going to be significant. In my particular line of work, home building and land development, we're already experiencing some shortages of critical materials in the construction of homes. I think this problem is going to be further aggravated as we get into the project. 452

Turning to the subject of land use, for just one moment, it is assumed in the DEIS that increased demand will have a potential beneficial effect by creating an infill of vacant lots. This may be true in terms -- true in the case of isolated lots scattered throughout the urban area where adequate facilities exist; where landowners have sufficient capital to develop or build on the property. We feel it is not the case, however, where the structure is not in place; 1114

(Statement - Tom Kilty)

where the costs of development are so great that they cannot be materialized and recovered in a reasonable length of time, or where the costs are to be borne by the city without substantial impact assistance. That possibility needs much more evaluation. 1114

We have a few additional matters of concern and we have some suggestions for mitigated measures that we feel are viable and we'll communicate these matters to you in writing before the deadline on the public comments.

Thank you very much.

COL. SMITH: Thank you very much, sir.

The next speaker that we have is Mr. Ralph Robinson, who is Chairman of the Recreation Subcommittee of the impact team.

Mr. Robinson?

239 MR. ROBINSON: Thank you very much, Mr. Chairman.

We appear here today as a subcommittee on Recreation from the impact team, and we welcome the Peacekeeping missile to Cheyenne, provided it is to our national defense. In the course of several meetings of the Recreation Subcommittee it has developed its comments. While much of the information is valid in your reports to us, there are some problems, particularly when it comes to quoting city standards. 1163

(Statement - Ralph Robinson)

For park lands in each neighborhood as well as the rather largely effective set of recommendations for mitigation, for this reason I am not going to go into these problems at this time. We will mail you or give you some information to what we object to so it can be mitigated at that time. 1153

Thank you.

COL. SMITH: Thank you, sir.

Our next speaker is Mr. Jon Arason, a planner with the City-County Planning Commission here in Cheyenne.

160 MR. ARASON: Thank you.

I am here today wearing a couple of hats. I represent the Utility Subcommittee on the Mayor's impact committee, and also I am here as a community planner representing, to a certain extent, the Southside Sewer District.

As you know, the provisions for public utilities and services is closely related to land use decisions especially in this case, this special allocation of housing. In order to preclude an over-extension of these services for a short term impact, the utility companies would prefer a dispersal onto existing platted lands -- lands which have approved segments in place -- or onto infill areas. In order for these utilities to plan for impact growth as opposed to normal forecasting, the allocation of impact uses is 833

(Statement - Jon Arason)

essential. We want to try to avoid an over building situation. 833

Another aspect of utilities that wasn't considered that we specifically dealt with on the committee, with which I'm familiar, is the 201 Finding, Facilities Planned for Waste Water Treating, which has been leaned onto, to a great extent, in the environmental impact statement. I would like to state that the prospects for funding from EPA now are a lot better than they were when the environmental impact statement was written. The way we're being faced right now, the entire plan can be built out in two years with the federal funding; however, in fiscal 1985, we would have -- may have -- a great deal of difficulty coming up with a $1.2 million match without further assistance. 913

The main point is -- I'm not quite sure what is going to go on with the South Cheyenne Water and Sewer District right now and with all the meetings we've had and the changes that have been suggested. I assume that the premise of the environmental impact draft statement that we read was -- the original premise -- was that 60 percent of the population was to live down there. You have listened to other people's comments on that matter, and we have talked to you. I think the population will probably be dispersed. If this population projection persists, the population is 227

(Statement - Jon Arason)

going to go down. We would require much more intense scrutiny in the evaluation of the areas and the specific impact in the district and all major categories of public facilities. I agree, and I think that the dispersal and the level of population to other areas would go a long ways to mitigating a great deal of the impact. 227

COL. SMITH: Thank you very much, sir.

Our next speaker is Maury Plambeck, I believe it is, a planner with the City and County Planning Commission here in the City of Cheyenne.

Good afternoon, sir.

233 MR. PLAMBECK: I am representing the Land Use Subcommittee of the Mayor's impact team. The comments I'm going to make today are very general.

The impacts projected for urban and rural land use do not include all issues of land use that the committee feels are important. The definitions to level of impact need to be more clarified and the quality of the land in the region needs to be maintained as well as upgraded here. On the political and development processes and the development costs, they will have some effect on our future land use, the committee feels, and impact upon redevelopment needs to be given more consideration. 1101

The committee also feels that some of the

(Statement - Maury Plambeck)

mitigation measures are either not appropriate or unrealistic, and we have recommendations for other mitigation measures. The thorough explanation of these issues will be provided by the committee in a written report. 1101

Thank you.

COL. SMITH: Thank you very much, sir.

Our next speaker is Adora Palmer, Assistant Planning Director for the City and County Planning Commission, I assume.

Good afternoon, Ma'am.

232 MS. PALMER: As a staff member of Heritage, Values and Well-Being Subcommittee on the Mayor's impact team, I want today to address my comments to the social well-being portion of the environmental impact statement.

I have worked with other groups in preparing more EIS statements presented at hearings yesterday and today. I have submitted written comments regarding -- which we will be submitting -- regarding the Draft Environmental Impact Statement.

My concerns are as follows: Beginning with the definition of impact in the well-being section. High impact is defined as a situation in which similar changes have not occurred in the past. This does not correspond to the normal section of meaning of high impact and the results are, in 485

(Statement - Adora Palmer)

effect, a Catch-22 with regard to well-being, precluding any conclusion, that impacts might be high for this community. I would maintain that a number of transients which can be expected is unprecedented and should, therefore, fall into the high impact category even if the definition is not changed.

With regard to short term and long term impacts, impacts on social well-being cannot be confined to short term. Indigents will stay on; social alienation will probably rise as previously employed people become unemployed. Furthermore, it cannot be assumed that unemployed people will out migrate when the project is over, especially families seeking stability. At the same time these people may also sense a great deal of alienation. 485

The Draft Environmental Impact Statement states that the rate of social alienation will increase, but the ratio of social problems will be stable. This conclusion doesn't follow; alienated people will have social problems. The Draft Environmental Impact Statement assumes that inflation will not be a problem for low and fixed income citizens when construction is completed. This appears incorrect. Prices are not likely to go down. Also, these people are likely to have to maintain debts incurred during the inflationary period in places of long term impact. Down turn or 486 487 315

(Statement - Adora Palmer)

bust problems in our housing market will develop some long range problems more than a short term problem as indicated in the Draft Environmental Impact Statement. The consequences of over building and over spending would be felt in the community for years. The Draft Environmental Impact Statement concludes that there will be some benefits to social well-being from the project. We certainly hope that you will not conclude that the benefits will outweigh the adverse impacts. In most cases the issues are not closely related. 315 489

The Draft Environmental Impact Statement states that the community will benefit by increased taxes on business and the ability to provide more services. My opinion is these down turns will create even more problems. The levels will be in place and the expectations for services will be established. What will happen when the same levels of services cannot continue to be provided? 435

The statement concludes that this is an opportunity for innovative planning for the community. I think that the final statement needs to explain how this can be made to happen. 491

With regard to mitigation we need some assurance that mitigation measures will take place in time. This is of central importance to the environmental impact statement. Also, in the mitigation section, the issue of a declining 492 493

(Statement - Adora Palmer)

pool of volunteers because of increased employment must be addressed; use of volunteers may not be a viable mitigation alternative. Furthermore, decision makers must be equipped to deal with impacts if many of the mitigation measures are to work; yet no avenue for rethinking them for that impact is recommended. 493 492

Finally, I agree with the Air Force about the importance of assessing needs and monitoring change; however neither of these is actually mitigation. A way to deal with it must be found. I would recommend that a fund tied to the monitoring program be established and administered jointly by the Air Force at the local community. This will give meaning to the mitigation measures recommended in the DEIS. If we can't respond to impact in time when we recognize them, the recommended mitigation measures won't have done as much good. 88

Thank you.

COL. SMITH: Thank you very much.

Our next speaker is Father Eugene Todd, Rector at St. Mark's Church.

295 FATHER TODD: Mr. Chairman, I represent the Heritage, Values and Well-Being Subcommittee, and I understand several members of this committee will be speaking tonight and will be presenting to the hearing a prepared

(Statement - Father Todd)

statement. I simply want to speak this afternoon very briefly to one single aspect of the report which will be made later on. That's pertaining to the transient situation in our community.

I have been born and raised in the State of Wyoming. I am a Wyomingite. I have been the Rector of St. Mark's Church in Cheyenne going on nineteen years. I have been Chairman and have organized what we call cooperative emergency assistance. Some kind of program to deal with the number of transients in this community of Cheyenne are necessary. Cheyenne is located on a major transcontinental highway and a major transcontinental railroad as well as a north and south interstate highway. People who are trying to move from the East Coast to the West Coast usually end up going through this part of the country and we are inundated with transients for long periods of time. 501

Finally, in the last couple of years and out of necessity, we were required to do something on a larger and broader cooperative basis. For the first time we were able to involve some city resources and some county resources to help us deal with it. We have had an increase in population of 300 percent of transients here in the last year. We have a warm shelter where we are trying to put up people at a warm shelter and they are packed to capacity.

(Statement - Father Todd)

We are fully aware that with even the talk of the MX that it will be expecting at least a thousand person increase within the next year, and we would expect that we would have reason to expect it -- after all, if a man has been out of work in Detroit or Birmingham, we respect -- our society respects someone who says as a last-ditch effort I am willing to do something; I am hoping this might be a possibility that I can work here. So they come even though they've been told that maybe work is not going to be available. Still there is that positive aspect about it which makes us think there might be a chance to support my family; to have self dignity about myself again. So here they come and they find nothing here.

So the bottom line is that by five o'clock in the afternoon the clergy of this community and the other representatives of the social services find a group of people standing at our door and saying to us, "We have no place to go tonight. We have no place to sleep. We're hungry. We're cold. It's ten below zero." What are we going to say? What can we do in that kind of situation?

I'm rather appalled at the report which I've been reading which indicates that this sort of thing is rather serious. But it's not going to have a long range effect. As a matter of fact, on the committee itself, the Heritage,

(Statement - Father Todd)

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Values and Well-Being Subcommittee, I rather viciously said, "Look at all this." I kind of gathered that the only thing that was going to have a long term effect would be a major detonation of the MX bomb. Everything else is just bound to be good for this community. But when you find someone standing there at the five o'clock hour, what are we going to say? "I know this is bad for you tonight, but in the long range it's going to be good for you." This is a major problem and I'm appalled at the fact that it's simply -- it isn't being recognized adequately; however, I can understand it because our society would prefer to believe that this doesn't exist. Our society would like to believe that there is not suffering; there is not hunger; there is not cold; there is not this sort of thing going on in Cheyenne, only in Detroit and Birmingham and places like that, but not here. But I'm sorry to say that it is here. We have people sleeping under bridges at night in the dead of winter.

I don't know how we are going to handle this situation. You say there is going to be additional volunteers. We're going to have to somehow create more resources. I'm doing all I can now to raise the funds, and there is no way that I see that we can increase a thousand percent or two thousand percent within the next year and a half. So as part of our recommendation coming out, which will be made

(Statement - Father Todd)

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later on this evening, we are recommending, among other things, that there must be a way for this community to be sure that it can cope in time with the needs identified during the subsequent monitoring. We recommend very strongly that there be some kind of mitigation fund established for which support for human services can be drawn when urgent needs are recognized; that this is a most appropriate mitigation measure for the issue areas in which the range of the MX is. The impact is difficult at this point to quantify. It allows the community to cope with change without over funding some services and short changing others. I strongly recommend it in our final report which will be made from the Heritage, Values and Well-Being Subcommittee, that we spell out more in detail what's going to have to be done to meet an emergency and critical need involving the well-being of people, even the bottom line of being intense suffering in this community.

I thank you very much.

COL. SMITH: Thank you very much, Father.

(Applause.)

COL. SMITH: Our next speaker is Mary Guthrie, an attorney here in Cheyenne, who is also a member of the impact team.

Good afternoon, Ma'am.

(Statement - Father Todd)

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VOICE: I'm not Mary, I'm sorry, she is not here. Could you possibly call on her later?

COL. SMITH: We certainly could.

VOICE: Thank you very much.

COL. SMITH: Our next speaker is B. G. McNabb, who is also a member of the Mayor's impact team.

Good afternoon, Mr. McNabb.

MR. McNABB: I thank you for the opportunity to make some remarks, but at the moment I have not had enough time to really go over the part of it that concerns us. We are having our meeting tomorrow. I'm on the Committee for Education and Training. I would like to ask you if I could postpone my remarks that I have to make until I can put them in writing after we have our formal meeting.

Thank you.

COL. SMITH: Thank you very much, sir.

Our next speaker is Mr. Michael N. Gostivich, I believe it is, Chairman of the Transportation Subcommittee. Did I get the name reasonably close, sir?

240 MR. GOSTIVICH: Right on. I couldn't have done it better myself. Thank you.

First, I would like to thank the Air Force for the cooperation and dialogue which we experienced with the URS Berger and their staff who compiled the DEIS.

(Statement - Michael Gostivich)

Many of our problems have been addressed. I'm sure our comment list would be considerably longer had not this dialogue taken place; however, that doesn't mean that there still aren't some areas of the report which we have some concerns about.

My comments are basically two types: The first deals with some generalities and the second with some specific mitigation measures.

First, if the housing areas differ from the assumption that most will go to the south side of Cheyenne, and then the accuracy of the transportation analysis is also in question. If, in light of the recent developments such as the moratorium by the Southside Sewer and Water District of the Mayor's committee, it appears that this basic assumption is in doubt. The DEIS shows that the south Cheyenne area will be heavily impacted if the housing assumptions are correct; however, it seems that there's very little consideration that has been given to transportation problems in this area. College Drive and I-25 have been singled out, for example, as the high impact area which will geometrically change. Surely other areas of College Drive will also be impacted. This is of particular importance to us for the safety of our children going to and from Rossman School.

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The draft DEIS identifies the impacted areas with

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(Statement - Michael Gostivich)

little mitigation measures to be taken. But the report does not give any indication of how much the mitigations will -- the mitigation measures -- will actually help with the impact traffic volume. For example, the level of service of Pershing and Logan will drop abruptly. Mitigation measures should include how much it will help the level of service or what. The report does not discuss the time engaged in physical improvements. This has to be considered so that construction does not interfere with the traffic demand that it is supposed to be helping.

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I can give you the example of the situation of the I-25 and Randall Avenue interchange. That will be highly impacted with on Base construction in 1985. The mitigation measures include geometric changes to interchanges and to possibly include rebuilding the structures. At this point in the report nothing has been done to program this work. It's not November of 1983, and the project needs to be functioning by 1985. Is there time enough to complete this work?

1004

I didn't see any discussion related to increased maintenance of urban roadways or deterioration because of the increased traffic loads, some of these specific mitigation measures. I find it difficult to believe that only naturalization improvements will solve the problems on Pershing and

1005

(Statement - Michael Gostivich)

Logan areas. I think adequate solutions require geometric changes. The report identifies some areas which will be impacted, but there are no mitigation measures suggested. For example, Randall and Snyder and Del Range and Converse and Del Range and Windmill which are Base access for the contractors, equipment and materials was not discussed, at least that I found. This will have a major impact on this and particular access should be considered.

1005

In your discussion on county roads you discussed -- there was a statement regarding the improved safety on rural roads that will come about with some of the improvements. If geometric changes aren't consistant with acceptable designed speeds, the statement may be in error.

1006

Finally, I take exception with your statement that it does not matter that there will be any residual or unevaluated impacts as a result from the project. This is a value judgment on the part of the Air Force, and discussion put forth in the draft DEIS does not lead me to totally agree at this point in time; in addition, no oral comments were submitted with written comments.

1007

COL. SMITH: Thank you very much, sir.

That's the extent of the elected and appointed officials that we have here this afternoon. We will take a ten minute break and upon returning we will start in with

(Statement - Michael Gostivich)

questions and comments and statements from individuals and representatives of organizations.

Let's break for about ten minutes.

(A short recess was taken.)

COL. SMITH: We will continue with the hearing. At this point we'll now have statements, questions and comments from citizens and representatives of various organizations in the community. Once again, we ask you to hold your comments or statements to five minutes. Quite a few cards here and we want to get to everybody who submitted a card.

Our first speaker is Edward E. Warsaw, a Program Director for the V. A. Medical Center for alcohol and drug treatment.

404 MR. WARSAW: Thank you.

I'm speaking as a private citizen this afternoon. I had occasion to go over to the library and pick up some of the volumes of the DEIS, and I didn't realize this was in three or four volumes. So my remarks will be in reference to Volume I, page 3-72 and 73, on city revenues for disposal of toxic and hazardous waste and the construction. It indicates that there will be nearly seven tons of waste per day in '84, going up to nearly ten times per day in '85. That is calculating that -- we're looking at about 12,000

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(Statement - Edward Warsaw)

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tons of waste, and also the removal of buildings and pavement totals 626 tons over '84 and '85. I guess that's an estimate by the Corp of Engineers, with the reference there that local officials do not anticipate that waste of this low volume would impact disposal site operations. 930

As a layman, it seems like this is a great deal to deal with, and maybe this should be looked at a little bit more closely. Under toxic and hazardous waste, 3.3.4.2, there were no quantitative figures given, and I was just wondering where these figures are. The only reference I could find is that these would be minor in quantity. I'm not sure what minor in quantity is. There was no reference given to nuclear waste material, and I don't know whether this was even included in this section. It seems that that would be a very important section of the DEIS, so far as I was concerned as a citizen. 935

The next reference is under the remarks of the Social Action Office at Warren Air Force Base, Unmet Needs, and there is a list of unmet human services that states F. E. Warren Human Services Agencies must be supplemented by services in the community, and they're designated as mental health counseling for abused and neglected children, long term therapy, bio-feedback services for developmentally disabled, special services, domestic violence shelter, rehab 770

(Statement - Edward Warsaw)

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and so forth. Directly following that under mitigation measures it indicates in the DEIS that no mitigation measures are suggested, and it seems to me if there is going to be more people, for example, coming, that maybe something should be done to expand or consider expanding the personnel there for the social action office so that they do not impact quite so much on human services. 770

The next reference has to do with human services in still Volume I, 3-279 and 280, Potential Impact on Substance Abuse Programs and Domestic Violence, their case load and lack of adequate treatment programs, and needs for increased staff of two persons in the peak year. But I couldn't find designations as to who or where these two people would be and how that would be taken care of and by what agency, and so that seems to be unclear. 727

For human services use there were potential impacts designated as increased domestic violence, increased instances of alcohol and substance abuse and lowering of services due to increased demands.

I guess I feel that this is more than potential. I think that we can anticipate that, and I question some of that language. There is reference under the transportation that there would be a possible increase in the number of accidents. That seems to be with the additional vehicular 40

(Statement - Edward Warsaw)

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traffic and there is no question about that. I could not find a reference -- I'm not sure where it was because I couldn't follow the table of contents -- but I couldn't find a reference on impact, specifically on the medical and health care network, including the private sector resources and public sector resources, and I could find no specific reference on psychological effects, per se, and maybe that's in another volume. Perhaps you could make that a little bit more clear and a little bit more definite, because as I see it, I think the psychological effects would be monumental. Thank you. 40

COL. SMITH: Thank you, sir.

Does the team have any comments?

MR. HICKMAN: I would like to respond to a couple of points, especially to the number of points in trying to provide some reference to some of our other written material along with the DEIS, which was especially the major documents there, thirteen technical reports in each of the major resource areas that provide a detailed background and analysis for each of the analyses done within the DEIS.

In that I think you may find some of the responses to your questions that you presented, but I would like to provide a number of them with respect to solid waste that come to mind at this point.

(Statement - Mr. Hickman)

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The City of Cheyenne has a landfill facility which is projected to last, depending on the estimates, from eighty to one hundred years with currently some difficulties. Some analysis is going on with respect to its location. Specifically for some of these acres that are utilized; however, it is a large facility which does not present, at this point, a capacity problem. Major problem dealing with solid waste will be in the transportation of that waste to the landfill area, and specifically we have addressed a requirement of public vehicles, sanitation vehicles, that would work within the city and for any construction project waste. That requirement would be put within the contract for the contractors working on the site for the disposal and transportation of that material, to identify the landfill facility.

The second point with respect to the social action office is we have, within both the technical report of social services as well as in the Wyoming-Nebraska Social-economic Study, which was a study coming out of the memorandum of understanding between the states of Wyoming and Nebraska and the Department of Defense, we looked directly at all the service provided at F. E. Warren Air Force Base, and made recommendations within that document for both facility and manpower requirements.

Human services, specifically with drug and alcohol

(Statement - Mr. Hickman)

abuse programs, we have named specifically the various programs, half-way houses and other activities within the Cheyenne and Laramie County, as well as in Kimball and Kimball County. Each of those agencies potentially would need added support and potentially added personnel. We did not, at this juncture, actually assign specific personnel to a specific agency. The medical impacts again were looked at both in the public sector and private sector. The information for medical impact can be found within the public services technical report. Lastly, the psychological impacts have been dealt with specifically through agencies, both human services and public and private agencies, dealing with matters of social problems and physicological problems, for which they are responsible in responding to. This is addressed in some detail in both the technical report and in the Wyoming-Nebraska Socioeconomic Study.

COL. SMITH: Thank you.

Our next speaker is Becky M. Ruffing, Representative of the Wyoming Children as Teachers Peace Organization.

Good afternoon, Madam.

313 MS. RUFFING: Good afternoon.

My name is Becky Ruffing and I am a representative of the Wyoming Children as Teachers of Peace.

I am a native of Wyoming, a teacher, who has heard

(Statement - Becky Ruffing)

from our children that they are concerned and frightened about the prospect of their future life in the nuclear world. They see the build up of arms, the arms race; that the MX missile is part of life and can only allow us to drift toward unparalled catastrophe.

Let me share some of their thoughts from fifth graders in Dubois, Wyoming, in northwest Wyoming, far from here pretty much. "A nuclear warhead, they are going off all the time. War is happening." From a sixth grader, "Peace, please. No more war. Peace means lots of happiness. The world is one big smile." From an eighth grader, "Nuclear war is a burning pit that sucked Wyoming in as they play war games. There is no way to win." And finally from my sister, who is twelve, who came to me frightened and concerned, "Can't Wyoming have some peace, be a place of life and joy. Cause it feels as if President Reagan is a little boy with a nuclear toy." 40

As a teacher and concerned citizen, I think the environmental impact statement should address the psychological concerns of children and adults alike.

Thank you.

COL. SMITH: Thank you, Ma'am.

Our next speaker is Mr. Bowie Leichtweiss, I believe it is, speaking as an individual citizen. It is

(Statement - Becky Ruffing)

L-E-I-C-H-T-W-E-I-S-S. Is he still present? Apparently not.

Next we have Linda Kirkbride, Homemaker from Meridan, Wyoming.

VOICE: I believe she was just here. She had to go out for a minute. Maybe you could postpone -- here she is.

COL. SMITH: Okay.

Linda Kirkbride.

367 MS. KIRKBRIDE: Thank you. Sorry. I was outside with my two-year old.

Last night in Pine Bluffs there was some comments about the dust particulates, and we in agriculture, I think we especially who will have the additional traffic up and down our roads which starts the peak flight, which is on our ranch, are aware of those particulates of the additional traffic. When you said it was not significant last night, I would just ask that you contact the range land experts in this state and perhaps local experts in this county about that, because there is significant dust. Especially during drought years, and I think that to say that it's not significant is not right. 1487

Thank you.

COL. SMITH: Thank you, Ma'am.

(Statement - Linda Kirkbride)

DR. KRAMER: That is to say that the conditions as they exist are not significant. Your statement reflects some background and there may very well be significant dust. The project is not projected to produce of significant increment to that existing condition is what our statement meant by not significant.

COL. SMITH: Our next speaker is Sally Palmer, Wyoming Nuclear Weapons Freeze Coalition.

Dr. Palmer?

316 MS. PALMER: I'm the Reverand Dr. Sally Palmer, testifying on behalf of the Wyoming Nuclear Weapons Freeze Coalition, an organization comprised of nine local Wyoming groups advocating a bilateral verifiable freeze on the testing, production and deployment of nuclear weapons by both the Soviet Union and the United States.

Although our time to speak today is limited, we take this opportunity very seriously. As Americans, we enjoy great privileges and great responsibilities. In few other countries can citizens have the chance to examine and comment on issues as the proposed MX deployment. This is the essence of democracy, and we are proud of it.

The Air Force says we are to direct our comments to the subject areas outlined in the DEIS, not to the reasons for the proposed MX deployment or related issues. Technical

(Statement - Sally Palmer)

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areas such as water resources and schools are important and we will be supplying written comments on these topics. But today we wish to focus our comments on the overriding deficiencies of this document; its failure to seriously analyse alternatives to the proposed actions including the alternative of no deployment; its failure to describe the impact of the MX deployment and vulnerable silos and growing nuclear stability; and its failure to consider the new threats that deployment of this weapon will pose to Wyoming residents, including the possibility of nuclear war.

The Air Force's idea of analysing alternatives is to discuss different cable routes and modifications to the interstate highway. This is akin to discussing the arrangement of deck chairs on the Titanic. The real issue facing us is: Does the United States need the MX deployed in Minuteman silos? Is this action and this one alone truly the best our country could take?

A mere two years ago our current Secretary of Defense, Caspar Weinberger, told Congress that putting the MX into existing silos would not answer two or three of the concerns that I have; namely, that the location of these are well known and not hardened sufficiently, nor could they be of sufficient strategic value to count as a strategic improvement of our forces. The circumstances Mr. Weinberger

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spoke of have not changed. The Air Force states that this DEIS -- in this DEIS -- that neither super-hardening of silos nor installation of ballistic missile vent systems to protect the MX will be done, quote, "in the foreseeable future," unquote. We can only conclude that there are either plans for these defenses and that we're not being told about them now because the associated resource demand would be significantly greater than for the current proposals, or that deployment of the MX missile silos essentially is creating a vulnerable target.

For these reasons and many others, we believe the Air Force should thoroughly analyze the alternatives to the proposed action, because such analysis is that the heart of the national environmental policy act, the claim of the Air Force that Congress has commented on them from time to time and conducted such analysis is dubious. In any case regardless of the dubious legalities of this claim, this does a great disservice to the people of this region who are expected to live with this missile and have the right to know why.

It's been said that Wyoming residents are used to living with missiles because of the Minuteman. It's absolutely essential to realize that the MX is not just a fancy Minuteman. It's a fundamentally different weapon with

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its ten warheads and greater accuracy and destructive power. The MX will have the capacity to destroy missile silos, thereby putting the Soviets in an untenable position of using or losing their missiles. On the other hand, by deploying such a valuable target in a vulnerable silo we will, in the words of the late Senator Henry Jackson, quote, "Have given the Soviets a better target to shoot at," unquote.

We believe the DEIS should examine how the MX deployment will disturb the current nuclear balance between the two super powers and create greater nuclear instability. Although the DEIS states the MX is needed to deter nuclear war, it also says that the effects of nuclear war are, quote, "speculative," unquote; and, therefore, will not adjust the effects of nuclear war. The effects of nuclear war are far from speculative. They have been documented at Hiroshima, Nagasaki and numerous tests conducted by military as well as scientific projects from available information about the destructive power of nuclear weapons and the effects of radiation. We expect the real reason the Air Force ignores this issue is that they didn't want to say that nearly everyone would be killed and the Wyoming we know and love damaged beyond recognition. Driving over to Laramie or Rawlins, as called for in the Civil Defense Plan, will not make much difference. We cannot run away from nuclear war. So we have

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a right to be informed of the consequences, and we thank you for the opportunity to testify today.

COL. SMITH: Thank you very much, Ma'am.

(Applause.)

CAPT. McMULLEN: We certainly appreciate your comments and your concerns. Although I will not attempt to comment on all of your statement , I did detect one specific question that you asked. That question is: "Does the United States need the MX in Minuteman silos?"

That very same question was posed to a very distinguished group of individuals, a bipartisan group known as the Scowcroft Commission, who were charged with reviewing our entire strategic forces to pay particular attention to our land based systems. Out of that commission came a very, very important recommendation; that recommendation was that we need to modernize our land based intercontinental ballistic systems to enhance deterrents, and deterrances based on a capability to effectively retaliate against those assets which the Soviet Union value the most.

The Scowcroft Commission identified several problem areas in our land based intercontinental missile system. They are the aging of our existing systems; we have sixty systems, although we have modernized them to a certain extent, nevertheless they are becoming old.

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Secondly, and perhaps more importantly, as a result of the Soviet Union, in sinking vast resources into upgrading their high value assets, their commanding control and leadership facilities; their strategic forces, primarily their land based ICBMs, as a result of this super-hardening effort, our land based systems are virtually ineffective against those super-hardening structures. Therefore, the Scowcroft Commission recommended that in order to redress that counter military capability deficiency and the age problems, the immediate deployment of one hundred Peacekeeper missiles in existing Minuteman silos would be the answer. Part of their recommendations included some research and development to solve the long term problems of survivability since there was no near term, competent solution. There was uncertainties associated with super-hardening. It was felt that we needed to further do research work and that includes super-hardening. It also included immediate engineering design of a small missile carrying a single warhead to driving us away from these large missile carrying independently targeted range vehicles.

With that research and development of that small missile, they were -- we were looking at a variety of applications to include super-hardening. We were looking at a mobile type for the small and important adjunct to the

(Statement - Capt. McMullen)

deployment, the immediate deployment of the Peacekeeper missile system. The commission felt that with those objectives in mind an overriding goal of seeking arms reduction limitations, that this set of recommendations could offer us the immediate deterrence that we desperately need to address those two problems that I spoke of, and then looking at our long range problems. The arms control issue is a very important part of that aspect. As we proceed in that area, we of course hope to seek limitations on our nuclear arms.

Now, to your point of why we address only the deployment of one hundred Peacekeeper missiles in existing Minuteman silos, that was the decision that the President adopted and, in turn, forwarded that decision to Congress. They in turn approved that basis of load in May of this year. Our effort is to valuate the potential impacts associated with that deployment and identify possible mitigations to lessen that impact.

With respect regarding the no action alternative, we have identified that as a possible alternative since the decision has been made to deploy the one hundred MX missiles. Then we are not looking at alternative basing loads. Nor do we have any plans to add anti-ballistic missile systems or a super-hardening of these existing silos with the advent

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of the MX.

COL. SMITH: Thank you.

Our next speaker is Mr. Mac Kirkbride, Little Bear Route, Box 61, I believe is the address. Is it Mac Kirkbride?

368 MR. KIRKBRIDE: Yes. I'm sorry, I don't write very clearly.

COL. SMITH: I don't read very well apparently.

MS. KIRKBRIDE: Okay. I'm Mac Kirkbride, one of the cattle farmers which lies close to that initial deployment area. My address is Little Bear Route, Box 61, Cheyenne. That is where I reside.

I read my copy of the DEIS this morning at eleven o'clock or so. Haven't had much time to study it; however, I would like to address some of my concerns beyond the basic ones that this system will not make us safe. I wholeheartedly enforce the statement that the doctor made, and that is that the Air Force has no business selling this program to us in the first place. 104

In reading the executive summary in the DEIS, I find several areas which I feel were either not adequately addressed or completely ignored. Among these are public finance, construction resources, social well-being, public services, utilities, transportation, land use, recreation, 101

(Statement - Mac Kirkbride)

water resources, biological resources, threatened and endangered species, geological resources, air quality, and they have not studied, as far as I can see, the economic impacts on farms and ranches at all. 101

I will deal with most of these issues in writing since you don't have time to go into it here. As far as public finance goes, your suggestion is that taxes be raised. I submit to you that most of the ranchers and farmers in this area are in the crunch of economic collapse now. There was many of them just hanging on by their fingertips. Any impact is taxes would push some of them over the brink. Construction resources, most farmers and ranchers use all these resources that will be used for improving the site and for building the roads, the concrete, the price of concrete will go up, if it's available at all; steel, lumber, all those things are things that are used on ranches and farms, and it's hard enough now for us to find the economic resources to do any sort of improvements to our farms. 419 459

Social well-being, it's a little hard; that's a little more esoteric, probably. Most of us are accustomed to life in the communities the way it is and any impact will be noticeable. It will cause mental and physical hardship, no doubt. Public services. Public services are already a problem. There is -- ambulance service, for 490 540

(Statement - Mac Kirkbride)

example, is -- it pretty well is taken care of now. But if we have an impact of people moving into the area the services of the ambulances will be stretched. The hospital services -- doctors are already -- have as many patients as they can handle, and so on down the line. 540

Utilities. We wonder how this is going to affect our utilities. We have -- we are dependent on the REA, and our electricity comes in on long lines from long distances. If those lines are disrupted, it costs us a big hardship for most of us. Telephones. I didn't hear any mention of telephone services. The lines into Albin are already pretty well filled up. If the Air Force is intent upon putting more telephones into the area, I can't see how they can do it anyway. But to put in more cable, there is many people out my way that would like to have their telephone service upgraded, and there is no room on the existing cable services to do that. 962 866

Transportation. When you have several, maybe a hundred trucks, running up and down the road everyday, that leads to a safety problem. Those roads are narrow; they are hilly; there are sharp curves and this problem isn't addressed. The county can't do it. The county barely has the funds to keep them graded and graveled. It will create a lot of dust, and that creates a visibility problem unless you are planning 1006 1008

(Statement - Mae Kirkbride)

on paving them. The county can't possibly afford to pave anything. 1008

Then there is the matter of safety zones around the sites. I wonder if they -- if this committee, this study has considered whether or not the roads around the sites will have to be moved because of the safety zones. Let's see. 188

Land use. I think there are two down here at the bottom that weren't addressed at all. One is the economic effect on the agriculture. You talked about that in the first two. I think that that's something that this study has pretty much ignored. They must consider us invisible or something because I just can't see that they have even given us any consideration at all. Then there's another matter of liability for injury and damage. 1100

Last time when a Minuteman system was put in, it was left up to the contractors to take care of that area. I think it's the Air Force's responsibility since they are the ones that bring these contractors in. My mother-in-law is permanently crippled because a contractor left a ditch open on a public road and she drove into it one dark night. I think it's something that certainly you need to address. 115

Well-bring. Some of us may be in courts for months or years trying to settle up liability problems, and I've got

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some other things. One of them is the geologic resources. I don't know how they feel about oil wells, where the county is undergoing a minor oil boom at the moment, and there is good possibility there will be a lot more oil wells going into this county. I don't know how this committee looks at that sort of situation, and if you'd like to speak to any of these I'd be glad to listen. 966

COL. SMITH: Thank you, Ma'am.

MR. HICKMAN: I would like to comment on those topics that come within the purview of human resources. I think the one area that you are mostly interested in, and one that you pointed out was perhaps most lacking within the DEIS, was that of the effect on the agriculture, the agricultural population and the industry itself.

As part of our economic analysis, we have done a base line and projected base line. That is a forecast of economic activity for all of the economic sectors within the six counties affected by the Peacekeeper project. Agriculture in those six counties, certainly in Laramie County, is one of the major industries, and is recognized as what is called a basic industry for the county. That is an industry which essentially exports its products. The employment within agriculture and the overall levels of production that we are currently forecasting for Laramie County, let's say, are

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primarily based on economic activity within the region and within the nation as a whole effect some changes within the agricultural industry. That isn't to say that specific project impacts, those that might interrupt some of the growth zones and harvest zones, the potential interruption with trenches for the various capability and modifications of the access roads themselves are all zones as certainly having potential impacts on the industry and on production itself for several of the years.

From some of the comments we received last night specifically with respect to potential injury to livestock, potential interruption of transportation of harvest goods, I think we will be adding those factors to our agricultural study, and we'll once again assess what the forecast impact is likely to be on the industry. We appreciate some of the more specific factors that have been brought up and we'll certainly integrate them into our analysis.

Just a couple of other points you brought up I will mention briefly, if indeed an economist can mention anything briefly. I will give it a try.

The first is public finance. We recognize that within the base line sector of the provision of public goods and services there is an ever increasing desire on the part of the growing population, not necessarily the impact of

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population, but the resident population itself, to improve the public services that are provided, education, public health, the major services of the community. Generally to improve services, we would see the need for additional revenues and additional revenues come from both growth and added population and potentially from increased rates of taxation. Those choices for the base line and those choices as both the city and county grow will be political decisions made by the citizens. When we look at the impacts of the project itself and the potential need for increased facilities and personnel, materials or any other factors that might increase costs, we would recommend that once the identified impact is going to require added funds that those funds potentially would have to be forthcoming from new sources. As a separate part, actually as a separate study, although it is related to the DEIS and the FEIS, there is being prepared by the Office of Economic Adjustment a physical impact analysis which looks at both the revenues and expenditure patterns of all the local jurisdictions affected by the project. The outcome of that physical impact analysis will be decisions by the Congress as to levels of additional funds that will be needed to provide for services caused and required by the project itself.

So I would say that we are not within our study and

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we certainly would not recommend that the source of funding for impact problems would come from increased taxes. That if it is identified, that additional funds will be needed, it will be up to the fiscal impact analysis and eventually the Congress to reconcile those needs.

The next point was construction resources. We have looked and I think we agreed that the construction resources that the Air Force is looking for for its project are those that are most often needed within the county, both home building industry and within agriculture. In our conversations with the suppliers, both locally and regionally for these products, we have identified no current forecast of a short fall for any of these construction products; however, we do recognize that we will -- and we point out -- the possibility of increases in the price of these resources may well come about. We will take into account that statement and again reassess what the possibilities are both in agriculture and for all other industries, increases in those commodity prices might have upon the local economy.

I think that covers the major points. If there are any other -- you have a number of statements. I think all of them are areas where through both statements from the city and state and county and from even the people during our process, we are reassessing what needs to be contained within

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the study and seeing that the DEIS will have to be as accurate and reflective of these comments as we can possibly make it.

CAPT. McMULLEN: With respect to the question about the roads within the safety zones, if your question is do we plan to alter or change the routing outside the safety zones, the answer is no.

DR. KRAMER: I would like to reiterate a statement we made early this afternoon that does relate to some of your concerns that you haven't had time to research the document and that was in a few hours today. But that there are additonal environmental, planning, technical report documents that are available per your other subjects of concern for any of the human resources or natural resources. You may find a number of your more detailed interests are addressed there because the DEIS, as we've already said, is a summary of a lot of other documentation.

COL. SMITH: Thank you.

Our next speaker is Eileen M. Leppe, I believe it is, representing Tri-State.

206 MS. LEPPE: Yes. I have several simple questions and I'd like simple answers.

I read the Air Force's answers about the 223 missiles. I'd like to know what they plan to do with the 146

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223 missiles, what the replacement attrition is for the one hundred missiles that they're going to put in. Also, I use the Air Base. My husband is retired military. I would like to know what additions are going to be made at the Base at the commissary and the PX as far as the people who will be coming in with their families and as far as the PX and hospital and commissary, et ceters. 146 148

Then one more question. Does the federal government plan to give so much money per student for the military children who come in or for -- and also for the impact children coming for the school system? I know they continue to decrease the amount that they give. I'd like to know what they are giving now for military children. 515

Thank you.

CAPT. McMULLEN: With respect to the first question regarding the acquisition of 223 missiles, with a procurement or buy of land base missile system or any strategic system we buy a sufficient quantity above that which we plan to deploy to be used for a variety of things. Let me quickly identify what that additional 123 missiles will be used for.

We have a vigorous testing program. It's done at Vandenberg Air Force Base. They will use some of those to test their reliability of the system. Secondly, we use

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those extra assets for spare parts in the event that a particular missile on location has operation deficiencies or breaks, in a simple matter of speaking. Lastly, we use them for aging and surveillance. We actually put them on a shelf and monitor their life to see if there's deterioration or problems that we may have passed over on the life of the missile.

LT. COL. WALSH: You had a certain question regarding the construction on the Base to accommodate the immigration of service personnel.

The overall projection or increase in worker population on the Base is 475. Of that amount, approximately 400 would be service personnel. The Air Force, in fact the Department of Defense, has a policy of analyzing the capital of a community as well as on Base resources to determine the need for additional housing. With that small increase we expect in the long term phase of this operation that there will be adequate accommodations in the local area to accommodate that increase of 400 and their families. There will be some other construction on Base that is related to the number of people available. For instance, the commissary and the PX. Those projects are already in the planning stages prior to the time that the decision was made to deploy the Peacekeeper missile system at F. E. Warren Air Force

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Base. The only fact that influenced the PX and commissary construction was the final numbers of people that would be located at the Base, because that determined the appropriate size of the commissary and the PX to be built for them.

There was and still is a project to construct new housing on the Base. This project was in being prior to the decision to build the MX or construct the Peacekeeper system at F. E. Warren Air Force Base, and there is only -- the project basically replaces substandard housing already and there will be no net increase in the number of houses at F. E. Warren in the long term.

Now, for your last question I will turn to you, Mr. Hickman.

MR. HICKMAN: I've been looking furtively for the one question you asked, which is what is the exact amount per student that we're supplying. I don't have that information right now but can certainly provide that to you immediately after the meeting or at break. The two other points of your question I think I can answer, however.

We are seeing that Public Law 674, which does provide for a subsidy to school districts for military children and military people, will continue. We have no, within that projection, specific decrease from the current level on that subsidy. Although, as you mentioned, that is

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possible. We have not, within our projections for the budget of Laramie County School District No. 1, built in currently any subsidy or additional federal funds for non-military children of non-military people.

COL. SMITH: The next speaker that we have is Josephine T. Porter of the Wyoming Outdoor Council.

Ms. Porter?

319 MS. PORTER: Good afternoon. My name is Josephine Porter. I am on the Board of Directors of the Wyoming Outdoor Council. The Wyoming Outdoor Council is a statewide citizens group organized to protect Wyoming's natural and man-made resources. We are dedicated to involving citizens in the decisions that affect their lives to insure Wyoming's future takes place on Wyoming's terms.

I would like to thank the Air Force for this opportunity to speak. I will be brief, as the Outdoor Council will be filing written comments on many of the specifics that are within the Draft Impact Statement.

The first comment that I have concerns the timing of this particular hearing and the other hearings around the region. I do not believe that having hearings so soon after the release of the Draft Impact Statement encourages citizens involved in the process. Instead I believe it does the opposite effect for a person who has precious little

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time to review this weighty document, in the first place, and for that person to have comments ready for an oral presentation a little more than two weeks after the release of the document is almost impossible. There are those who prefer to give written statements who are precluded because the hearing took place so soon after they received the statement. I think we've seen some of that here this afternoon.

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The question I would just like to ask is why the hearings were not scheduled later and the comment period longer therefore people would have the opportunity to review the statement. I believe the Air Force would also have more response and informed comments were the hearings in late November rather than now.

My second comment concerns the statement in the DEIS that the basing mode of the MX and the location of the MX are exactly from the National Environmental Policy Act. As I said earlier, I am a Cheyenne attorney and my firm believes, after doing quite a bit of research into the subject of intercontinental action that is referred to in the DEIS, and is also public in the Jackson amendment, does no such thing. The Jackson amendment provided for the report, as you've already stated and ultimately in the Scowcroft Commission report.

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I will quote from the Jackson amendment. It states, I quote, "The report required under the subsection shall not be subject to the requirements of Section 102, 2-C of the National Environmental Policy Act of 1969, relating to the Environmental Impact Statement," unquote. That subsection is the section that requires the environmental impact statement for federal projects that will significantly affect the environment. Nowhere does Congress explain the basing mode or location of the MX. They only explain in the report only the Scowcroft Commission report, not the MX proposal. That is exempt from the DEIS process. Study of the case law surrounding the case of NEPA, the National Environmental Policy Act, also supports that unless the proposal is clearly and very specifically made exempt from NEPA, a federal action must comply completely and fully with the law and regulations and guidelines in writing and evaluation of the DEIS. This very question is currently under litigation in the District Court of Columbia. 76

That gets me to my next comment which is the DEIS severely is deficient and fails in many respects to comply with requirements of the National Environmental Policy Act. It is my contention and the contention of the Outdoor Council that the Air Force cannot pick and choose the part of NEPA that they will comply with. The DEIS process is

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intended to be a detailed statement on the alternatives to the proposed action and that indepth discussion of alternatives is supposed to be the quote, "heart of the DEIS"; the only alternative by law not required to be studied -- those are remote and speculative. We take the position that this includes, in the case of the MX, alternative basing modes and locations as well as indepth studies of required alternatives. No action at all for the above is found in the DEIS. 76

Secondly, the National Environmental Policy Act requires the DEIS review to be an all but remote and speculative impact of the project, yet this DEIS specifically excludes any discussion of super-hardening of protective structures in the use of ballistic missiles as defense. These, I submit, are not speculative. They are not remote impacts. In fact, a great deal of money, as you have spoken of this afternoon, is being put into research in these very areas. The impacts on the community will be dramatic and far exceed the study in the DEIS. The very purpose of the DEIS process is to give the public and the government a chance to comment and effect evironmentally significant decisions before those decisions are made. This purpose is made a farce by the exclusion in the DEIS of the discussion of impacts of super-hardening and ICBM systems. 35

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Furthermore, the National Environmental Impact Policy of nuclear attack is not discussed and I guess that is yet another example that the impact statement is severly deficient. The effects of war are sadly known and are not highly speculative. If the effects of the MX are to be thuroughly and completely evaluated, as is the intent of the DEIS process, then one must review war and peace time impacts. 37

My final comment is, despite the critical deficiencies in this statement, I would hope that in reviewing what is covered in this statement the Air Force will not I would hope that the DEIS process is not just to be a promotional document or paperwork or justification for decisions that have already been made. The purpose of the DEIS process again is to evaluate a proposal and permit the decision makers to change their mind if reason and good sense so dictate. We ask you to keep your mind open to change. 4

Thank you, and again we will be submitting written comments before the end of the comment period. I would ask that you not respond to my comments until the end of the hearing. I will remain to give everyone present a chance to testify and possibly tonight we will have more time. I would suggest that the panel limit their responses and perhaps it would be more brief if they would address only

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specific questions to insure that you don't run out of time to further insure that the public can participate in the hearing process.

Again, I thank you.

COL. SMITH: Thank you very much.

LT. COL. WALSH: We will honor the lady's request.

COL. SMITH: Our next speaker is Richard Gardner, Midwest Regional Director of Physicians for Social Responsibility.

283 MR. GARDNER: Hello. I'm here as a physician today. I'm a professor of radiology at Rush Medical College. I also serve as the Midwest Regional Director for Physicians for Social Responsibility. I am here in that capacity and as a citizen of this great country and as a father of three teenage daughters.

We live in a democracy, thank goodness. I'm here to help insure that process works just the same way that a physician does not give hope to a patient, or more importantly, does not give enough. We are working to save a patient while the patient is alive. We, the citizens of this country, must continue to keep the democratic process and make sure that our government knows how we feel about issues where our lives are so greatly at stake. For over

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thirty years we've had deterrents. I boutht that for a long time. It seemed to work. We didn't have nuclear war and the Minuteman missiles at Warren Air Force Base, which I've known about for a long time, for the nineteen years they have been here. When I started to get worried about this subject was when I realized that our government had dramatically changed its course for what those missiles meant, and what we plan to do with nuclear weapons. We had the missiles for years and the weapons to prevent nuclear war, and I've noticed a drift towards our government making statements about fighting and surviving and winning nuclear war. I got worried when I heard the representative of the Air Force and the Pentagon today saying our missiles are inadequate. I ask inadequate for what? There has been ample testimony that there have been many scientific meetings around the country and indeed around the world that there are more than enough nuclear weapons to certainly annihilate civilization as we know it. Then people can quibble as to whether we'll annihilate human beings or not. As far as the draft DEIS is concerned, I had a couple of comments. One is that on page 132, there is a list of all the prevention that we're going to have so that we won't have a mistake with inadvertent program launch and et cetera. I've talked about what inadvertent program launch is. It assures that

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means are there so that an advertent launch and the chances of that happening have been estimated. God knows how this is done, and how they can guess that it is less than one in ten trillion I don't know. I ask what was the estimated chance of inadvertent explosion of the Titan II missile before one exploded in its missile silo in Damask, Arkansas, in 1980, spewing contaminates out of that silo with reinforced concrete doors that is supposed to protect the silo. It was closed at the time of the explosion.

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In the environmental impact statement you talk about threatened and endangered species. We are worried about ferrets and trout and Butterfly plants and Wooly Milkvetches. That to me is like a patient who I've been seeing who has cancer who worries about the neighbor's case of the flu. But there is one other animal listed in the threatened and endangered species and that is the Bald Eagle. It's a bird which many of us admire. We admire our country for picking it up as the national symbol. I think that it is symbolic for what is really at stake here.

Everyone in this room wants U. S. security. We all love peace and freedom. I can count myself as one of the United States citizens who is ardently working for peace. But I wonder if threatening reductions with new and more powerful and more accurate missiles really increases our

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security, or does it jeopardize our security? Does making the reduction more iffy and more worried make us more secure or not? When we have enough missiles to annihilate their civilization many times over right now, does building more missiles -- if they're not a deterrent to what we have right now -- will they buy more if their missiles are not adequate.

It has been stated today by the Air Force representatives that if our missiles are inadequate why don't the Russians attack us now before we build the MX and cause them to scramble to either attack first or just reciprocate by building other weapons?

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Now, I'm from Chicago and I've come here today, giving up a days work, to testify because I think our environment is more than just the environment of this portion of the country. But where we live in one community we're all part of the same community, and I ask what this spending of $30 billion of our money, especially with our already shaky economy, what message will that give to our people about our priorities when from the children on up we all know that we already have more than enough nuclear weapons. We're part of that same area. Chicago is downwind from an attack on F. E. Warren Air Force Base, such that if any adversary chose to destroy the missile range here with many ground bursts, I in Chicago would die from lethal radiation

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fall-out, and we're part of the same community not just because of the transients who live under the bridges here in Warren the same as we do in Chicago and because in Chicago we have children who go to bed hungry; who are attacked by rats; who have to go to decaying, rotten public schools, but we're also part of the same community because our children, just like the children we've heard of here in Warren -- here in Cheyenne, excuse me -- feel they won't have a chance to grow up; because they feel we'll die in nuclear war and that is our environment. Our children are our environment. They are already affected and they are even more affected by the thought of building more nuclear weapons.

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As a physician, I must weigh the risks and benefit of a course of action, not just from one part of the patient but for the whole patient. Every time I prescribe penicillin for a strep throat, it's incumbant upon me to tell the patient that there is a chance, one in a million it's calculated and we have the figures, that one in a million patients will die from that shot of penicillin, and I should tell the patient that that's the chance that they face when I give them the shot of penicillin. I would like to consider, in its broadest context, what are the dangers of putting in the MX missile system and will it increase our

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security or will it not; will it threaten our environment, our moral, our spiritual environment; will it protect our security or will the missile system put -- make us sleep much less easy each night as we go to bed and make it harder for us to explain to our children that they will not die in nuclear war. 104

Thank you.

COL. SMITH: Thank you very much, Doctor.

Our next speaker is Frances Russell, Coordinator for Citizens of Tri-State.

297 MS. RUSSELL: I have two questions. One of the issues that was not mentioned in the DEIS is the probable and possible event that we would have a new executive director of our country, a new president; given the facts that the seven candidates for the president of the United States in the Democratic Party have all opposed the MX missiles, given the fact that we will elect a new Congress this coming November, and given the fact that the City of Cheyenne is growing and the spirit of enlightenment about this project, why does the DEIS not consider the fact that the MX appropriations may fail in 1985 or 1986 and if so, if these appropriations fail, what about the impact that will be created in this community when people will still be here perhaps hoping to engage in a project or looking for 118

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work or coming to the community, having had work in the project and it is ceased. I think that should be addressed in the Draft Statement, and as far as I can tell it has not been addressed. 118

Secondly, I would like you to clarify this evening what precisely the Jackson Amendment rescinded in terms of this process. I think it would help us all if we had a real clear understanding of the Jackson Amendment and what that amendment deleted in terms of requirements of this proceeding and what it included. 76

Thank you.

COL. SMITH: Thank you, Ma'am.

LT. COL. WALSH: With respect to your first question regarding if there is change in the executive and congressional desires and the program is less than currently programmed. Right now the Air Force is preparing an environmental impact statement for the President's decision for one hundred Peacekeeper missiles. If, at a later date, the President and Congress changes the size of the program we shall have to reevaluate the study that has been completed to see whether further study is required to fully define what the impacts are of the reduced program, and accordingly adjust the mitigation measures to accompany it.

With respect to your second question regarding the

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Jackson Amendment, when Congress expressed some concern about the recommendations for the closely spaced basing mode they recommended that we prepare a report to reevaluate all the basing modes that could be used and come up with a recommendation of which one should, in fact, be incremented. The Jackson Amendment, which was an amendment to the bill, the appropriation bill of 1983, exempted that particular study and that particular recommendation from NEPA. It did, however, suggest that environmental considerations be taken into account in making that recommendation. That, in fact, was accomplished.

COL. SMITH: Thank you.

Our next speaker is Evelyn F. Lifsey, representing Western Solidarity.

300 MS. LIFSEY: My name is Evelyn Lifsey, Coordinator of Western Solidarity. In the draft DEIS statement there was a letter by James Boatright saying the comment period should not be extended. But I feel that the way this whole hearing process has been conducted, including the way the scoping hearings were conducted in June and July requires an extension of the comment period, and in the spirit of the National Environmental Protection Act, any project that is considered large or controversial is supposed to have at least a sixty-day comment period and not a 23

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forty-five day comment period. This comment period actually is effectively less than forty-five days since most of us did not even receive copies of the DEIS until two weeks into the comment period. I had a hard time with the staff in San Bernadino, California, at the Air Force Base even getting a copy. But I finally did get a copy six days ago. 23

I feel that we have been deprived of adequate public notice of the public hearings in Colorado and Denver. They are specifically mentioned as having vast significant impact in Subsection 1.112 and 1.2212 and other points and places, and yet there are no hearings in Northern Colorado or in Denver. Yet these were requested. 22

The DEIS itself is numbered in a most cumbersome manner. There are several different sections, each with their numbering, dual numbering system. One is points and one is hyphens and there is no index. It's almost impossible to get through it. It takes several minutes to find any particular section that you're trying to identify. In addition, the technical part is twelve inches of technical documents which are supposed to be available in the state libraries. I haven't found them in local libraries in Denver which is where I live. We need that in order to evaluate what is written in the Draft Environmental Impact Statement. 54

So I would formally request that the comment period 26

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be extended. I know that, as a coordinator for an eight-state coalition -- I know that in Nevada, Utah, Wyoming, Colorado, North Dakota, South Dakota, Montana and Idaho that there are people all over the west who are concerned about the impact of the MX missile regionally. It is a regional and international issue and we have not had the tim to comment. 23

I follow along with Josephine Porter's comments that I don't need any feedback of my comments just now, but I would appreciate if you would incorporate my comments into the record.

Thank you.

COL. SMITH: Thank you very much, Ma'am.

Our next speaker is Marla G. Painter, representing Western Solidarity also.

308 MS. PAINTER: Some of my comments may sound redundant, but I think they have to be addressed to the record again and again because some of the comments this afternoon have been made more than once and are some of the most important comments that I've heard here. Although I have great sympathy for some of the local concerns, I have to also say that it strikes me at times as rather absurd that we're talking about intersections and traffic when we should be talking about one of the most dangerous weapons that

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mankind has ever developed and it's almost comical. But also it is very disturbing. That's not to say that I don't appreciate the local impact, because having come from the Great Basin, potential deployment area, and feeling as a citizen of this region, and therefore, knowing that we will all suffer the impact of the MX being built anywhere in the West, if not anywhere in the world, I do appreciate those concerns; however, there are some things this afternoon that have not been included here I want to say that we concur -- Western Solidarity concurs -- with the Wyoming Out door Council's appraisal of the Jackson Amendment. I also want to say that if the heart of the DEIS is the alternative section, this DEIS is rather heartless. You've really not adequately included a no action alternative in the project, and I think you've clearly gotten around that legally. But I don't think it fools people who really understand the intent of the law rather than the letter of the law. 76

You've not told us what the impacts would be for not building this system, and I don't mean just the impacts of not -- I don't mean just the legal impacts to the area in terms of roads and natural resources -- I'm obviously talking about national security. Any opinion is only as good as the validity of the background information from which it' drawn, and I want to say that we are a regional operation. 26

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yet we are unable to get any kind of satisfaction about how we could see the technical support documents. We tried our best to analyze this DEIS in the few days we were given as ours did not arrive in time to really take a good look at it. But even so, we couldn't have done a very good job. One consultant has said you have to look at the material, the data upon which these conclusions were drawn. We weren't able to do that. I was told by the Air Force that the people in Western Nebraska would be able to go to see this document in their state library, over 400 miles away fr them. That's not adequate public participation. 26

Now, I want to also say that the entire reason for the deployment of the MX was to put a deceptive basing mode so it won't be vulnerable. I've lived with the MX for four years now. I've heard reasons given for building the MX and then those very same reasons being given for why we shouldn't build the MX. I've heard contradictions; I've seen and heard the Air Force stick their foot in their mouth over and over and over again. The Air Force doesn't really know why it needs to build the MX, let's face it. It just has been given the orders to build the MX. For that you have to be forgiven. I mean, it's not your problem. It's our problem as citizens. If the MX isn't built in a decep- tive basing mode, the MX is vulnerable and if you don't 122

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intend to use these missiles first against the Soviet targets, then you must be setting us up as a nuclear sponge. You must be making us a concentrated, vulnerable target so that if the Soviets launch a lot of their missiles a lot of them will come here to destroy what is the most dangerous weapons that exist against them.

Now, these are very scary missiles. They are not the same as the Minuteman. They are not -- it's important for everybody to understand that -- they're the most accurate and most powerful warheads that we've ever created, and the Soviets have reason to be afraid of them. So I can't believe that we're spending $30 or $40 billion, whatever it is, to create the missile that we're either going to use or be used as a nuclear sponge and that we're going to launch it towards empty silos in the Soviet Union. 122

Okay. Enough of strategic things.

I think that you really need to be aware of the fact that these documents were not made available to people in the way that would cultivate public participation. This is not just a problem for Cheyenne. It is a big problem for Cheyenne and it is also a problem for all of us in the West and the process has not been fair. 24

Thank you.

COL. SMITH: Thank you very much, Ma'am.

(Statement - Marla Painter)

LT. COL. WALSH: The Draft Environmental Impact Statement was filed with the EPA on the 7th of October. On that same date we had a general news release to the news media in the region. The notice of availability of the document was filed in the Federal Register on the 14th of October. Prior to that date, the Air Force had sent, by express mail, to all libraries, to all city and county clerks in the division affected, complete sets of the documents including the DEIS and the supporting EPTRs. In addition, we sent copies of the documents to people that have already expressed interest in the project. The names of those people and those locations are contained in the appendix to the document.

So on the starting date, the forty-five day comment period, the document was in fact available throughout the communities that were to be affected.

Thank you.

COL. SMITH: Our next speaker is Reverend Stephen J. Sidorak, Executive Director of the Colorado Council of Churches.

Good afternoon, sir.

259 REV. SIDORAK: It's Sidorak, Col. Smith.

Distinguished members of the panel and ladies and gentlemen, I do want to say that my own Congresswoman in

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Colorado could not get a copy of your DEIS or even the executive summary. She was given the ruling by the Air Force in Washington, D.C., that if they really wanted it that badly in Denver they could come and get it. We still don't have a copy in the Congresswoman's office. 27

The recent report of the President's Commission on Strategic Forces, the Scowcroft Commission report, sought a solution to the many basing mode dilemmas which have plagued the proposed MX missile system since its birth on the drawing board. As such, the Scowcroft Commission report is a glaring failure. For the Scowcroft Commission report failed to address the issue of MX survivability and, in point of fact, recommends MX deployment in vulnerable, fixed silos now housing Minuteman missiles in Nebraska and Wyoming. Also, the Scowcroft Commission report slammed shut the celebrated window of vulnerability and affirmed that the United States retain a credible nuclear deterrent, despite the protestations of the Reagan administration in earlier days. 35

Not only is the Scowcroft Commission report a glaring failure, it contains one glaring contradiction; namely the recommendation given therein to move toward reducing the value and importance of individual strategic targets. The MX missile will not be just a new missile in an old hole, but an extremely tempting target for any Soviet military planner.

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The MX missile will be the most valuable and important individual strategic target in the U. S. nuclear arsenal, from a Soviet point of view. Instead of following one of its own key recommendations, the Scowcroft Commission advises increasing the value and importance of individual strategic targets by placing the Minuteman with the MX -- ten warheads where there were once only three -- actually inviting a Soviet first strike against it in a time of crisis or war.

Apparently the last argument left for the land base deployment of the MX is that of a symbolic demonstration of national will. In other words, we intend to deploy the MX, a tempting target in our territory, to show the Russians a thing or two. As a consequence, what the Scowcroft Commission report represents is a feeble attempt to find a political solution to military problems when it was appointed in the first place to find a military solution to all kinds of political problems. Indeed, most of the political problems associated with MX deployment were caused by the inability of the U. S. Air Force to find a home for the orphan missile MX. No wonder the Air Force confronts so many unanswered questions from informed citizens who oppose MX deployment. The MX story is not straight and the case for deployment remains unconvincing. 35

What makes matters worse are the "package" aspects

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of the proposals made in the Scowcroft Commission report, including the research and development on a ballistic missile defense system for the MX missile system and the research and development on a single warhead ICBM.

Any proposal to deploy a BMD system would probably mean abrogation of the ABMD treaty signed with the Soviets in 1972 and signal the start of a new nuclear arms race in anti-missile missiles. Furthermore, such a proposal would allow much more leeway for nuclear "war-fighting" policy to be officially adopted by building the case for "acceptable risk," the notion that the United States stands to gain, rather than lose, in any nuclear exchange, limited or otherwise. 35

Any proposal to deploy a single warhead ICBM, also known as a "Small Missile," or "Midgetman", has been complicated by the proposals made in the Report of the Small Missile Independent Advisory Groups released last September. The "Midgetman" missile was originally designed to be a "stabilizing" addition to the U. S. nuclear arsenal; that is, it could not possibly be construed as a "first-strike" weapon system. Now, however, the Report of the Small Missile Independent Advisory Group calls for characteristics to be designed for the new "Midgetman" missile which would clearly give it the capability "to put hard

(Statement - Rev. Stephen Sidorak)

targets at risk." Whatever the original rationale for the deployment of a "Midgetman" missile system may have been, vis-a-vis nuclear deterrents, has now been superceded by the new recommendations of the Small Missile Independent Advisory Group for the "Midgetman" missile system to be, like the MX missile system, a "counter-force" addition to America's nuclear arsenal. Moreover, the "Midgetman" missile system is being proposed in a dual basing mode -- in "hard mobile launchers" -- to be deployed "with peacetime operation on Department of Defense land areas," and in "super-hard silos." In addition, the Report of the Small Missile Independent Advisory Group indicates the preference for C3 components of the Midgetman to be compatible with Minuteman and MX C3 components, thereby indicating the likelihood of the Midgetman missile system to be based at F. E. Warren Air Force Base as well. So we see the handwriting on the wall for the people of the western United States. 35

What causes us serious concern in the religious community in our region and among the citizens of the western United States is the possibility of the deployment, not one, but of three new weapon systems in our backyard; the MX in 1986, the Midgetman in 1992 and an, as yet, undetermined date for any BMD. Of equal concern is the recognition that all three of these new weapon systems are designed to be

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ingredients in an overall nuclear strategy of "war-fighting," not deterrents.

Thus we respectfully request that the United States Air Force make full disclosure of its long range intentions for the deployment of any new weapon systems in the western United States. 36

Incidentally, I, too, support the strong national defense, as the Mayor indicated of Cheyenne, Mayor Erickson. But I have serious misgivings when all indications are that there has been a fundamental shift in nuclear policy in development of nuclear weaponry. We can no longer view the posposed MX missile system in complete isolation from any other long range plans that may be presently contemplated by the United States Air Force and recommend it as part of the Scowcroft Commission "package."

We, therefore, conclude that the DEIS hearing already underway on the proposed MX missile system must be expanded to incorporate our concerns with any proposals that may be forthcoming concering the deployment of the Midgetman missile system and a BMD. In short, the DEIS process now operative is obviously inadequate and may be deliberately misleading. 78

In conclusion, in its DEIS, the U. S. Air Force acknowledges that there will be, indeed, impacts upon the 22

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State of Colorado. As a proud resident of the State of Colorado, I am appalled at the conduct of the U. S. Air Force in consistently ignoring the various requests made by Colorado politcal leaders of both parties for DEIS hearings to be held in Colorado. The arrogant refusal by the U. S. Air Force to hold DEIS hearings in Colorado betrays the "railroading" mentality of U. S. Air Force officials in their efforts to finally find a last resort basing mode for the MX missile system.

Everyone involved in the MX debate south of the border is well aware that the U. S. Air Force has its foot-in-the-door of Colorado inasmuch as open ended expansion of the presently proposed MX missile system remains a distinct possibility. Moreover, any additional weapon systems that may be eventually proposed, such as the Midgetman or BMD, which I have previously mentioned, are bound to have "significant short and long term impacts" upon Colorado. 22

Therefore, I have deemed it imperative, professionally and personally, to make time in my busy schedule to travel to both Wyoming and Nebraska to address the DEIS hearings being held in these two states and to underline the concerns of Coloradoans directly in the presence of U. S. Air Force officials. I have a deep appreciation for the deceptive tactics of the U. S. Air Force because I have been involved

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in the ongoing MX debates for several years now, since I was a resident of Salt Lake City, Utah, when the MPS basing mode was proposed for the Great Basin. While in Utah, I worked closely and laboriously with the hierarchy of the Church of Jesus Christ of Latter Day Saints as an outside consultant to them in their MX deliberations. What I see now is what I saw then -- a lack of candor on the part of the U. S. Air Force officials with respect to the concerns of the citizens in the proposed MX deployment area. Behavior of the U. S. Air Force is inexcusable and unconscionable and exposes their contempt of due process and fair play. 22

Consequently, I trust that the U. S. Air Force will reconsider the bipartisan requests made by Colorado political leaders and extend the DEIS hearing process to my home state and I hope that the U. S. Air Force faces the fact that enormous public pressure will be brought to bear on our Governor, Richard Lamm, and the Colorado Congressional Delegation to reiterate their requests loud and clear.

Thank you.

COL. SMITH: Thank you.

Reverend Sidorak, I do have two questions I want you to respond to.

LT. COL. WALSH: I think, sir, we've gone beyond the five minutes. We've got a couple of cards

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remaining. Perhaps if you could return this evening.

We have gone beyond the time that we scheduled to close, but you have a couple of cards remaining and we will take the remaining cards.

First, we have Timothy M. Strand representing Western Solidarity.

Mr. Strand?

310 MR. STRAND: Thank you.

I have just a comment. In talking to people of Wyoming, we are all well aware that one of the other real concerns or rationale for bringing MX to the silos in Wyoming is economic impact and what some people feel is a beneficial impact. I would like to see as an alternative in this DEIS the Air Force address expending the vast amount of money that is going into this plan and seeing if they could not expend somebody to entice commercial private enterprises to come to Cheyenne on a smaller scale that would stay in Cheyenne and create a stable tax base. It would employ southeast Wyoming's unemployed, which would avoid many of the boom and bust scenarios which have been described this afternoon. I think that is a viable option that should be considered in the draft DEIS so the city leaders of southeast Cheyenne and southeast Wyoming can economically and intelligently make a decision as to which type of improvement they want in this

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(Statement - Timothy Strand)

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area. Also so the citizens of Wyoming particularly will know that there are other options, economic options, to the MX in terms of creating jobs.

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COL. SMITH: Thank you very much, sir.

Now we have Timothy P. Daly, Outreach Coordinator for Community Action of Laramie County Outreach, I believe it is.

Good afternoon, sir.

261 MR. DALY: Thank you.

I am also a member of Mayor Erickson's Coping Mechanism Subcommittee on his impact team. We have several areas of concern in the area of social services. Our first concern is the fact that the Air Force does not have estimated potential for impact to social services. When projected impacts on social services and on the population increase and estimates have been examined. The study did not take into account the facts the level of the impact to social services, often occurring at a rate that is faster and higher than the actual percentage of population increase. This accelerated impact stems from the problems that result from the stress placed on the community due to the citizen increase in population. The possibilities or probability of new problems occurring in a disproportionate increase of current problems must be addressed in order for the DEIS to

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(Statement - Timothy Daly)

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be accurate.

Another problem is the underestimated problem of transients coming into Cheyenne looking for work on the project. The Air Force is also shrugging this problem off citing other projects of similar size and saying that since these projects did not have significant transient problems the MX project will not either. This project, however, could. This does not fit into the mold. People from Florida to California know that a large military project is being built in Cheyenne, and with the national unemployment rate currently at the level it is, unemployed persons are bound to find Cheyenne an attractive magnet. This is a problem this is already occurring and must be dealt with because by simply closing our eyes, these people will be gone away many times. They have sold all they have to get here, therefore, they cannot leave. Unlike all these other projects, the fact that the community is going to need timely, upfront money to deal with them. Although Cheyenne may receive enormous benefits from this project, the money increase in the economy will come too late to provide assistance to such areas as housing, police protection, social services and others. Since the federal government is the cause of the impact to these areas, adequate money must be furnished in a timely manner to prevent them. The statement has been made by the

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(Statement - Timothy Daly)

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Air Force and its consultants that money has been provided up front to the city to determine its priorities. Cheyenne should not have to decide which of the services should be maintained and which should be allowed to fall behind. All of the aspects of our quality of life should be allowed to prosper. We should not have to choose between streets and alleys and police protection or between education and social services.

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Cheyenne is in a unique position of being able to prevent some of the project elements from impacting the community. We must, however, have accurate information and good cooperation from the Air Force in order to do so. Due to the inaccuracies of the information provided by the Air Force included so far, this is not happening.

Thank you.

COL. SMITH: Thank you very much, sir.

The final card that I have is that of Mary H. Purdy of the Cheyenne Audubon Society. Ms. Purdy?

Apparently she's no longer present.

Let me check once again. How about Mary Guthrie, a member of the Mayor's impact team, has she returned or is she present?

Apparently not.

Col. Walsh is there anything further from the team?

(Statement - Timothy Daly)

LT. COL. WALSH: If you have any other comments that you wish to provide to us or any questions, you will have the opportunity at another hearing tonight at eight o'clock and subsequent hearings in Torrington, Wheatland, Harrisburg and Kimball. If at such time later you have some other comments that you have not thought of tonight, you may submit them to the address shown on the screen and the address is also in the pamphlet handed to you as you came in. If you have any further questions regarding the Peacekeeper deployment and the construction, et cetera, you may contact Col. Hickman concerning construction activities and assembly and checkout activities. You may also contact Capt. McMullen at the phone number or address shown here for any information concerning U. S. policy regarding this particular deployment.

Thank you very much for your participation this afternoon.

COL. SMITH: On behalf of the Air Force, I also thank you for participating and once again, we do have another hearing this evening.

Thank you and good afternoon.

(Whereupon, the hearing concluded at 6:50 p.m.)

C E R T I F I C A T E

I, KELLI KATAMELAS, a Certified Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 112 pages constitute a full, true and correct transcript.

Dated this 7th day of November, 1983.

Kelli Katamelas

KELLI KATAMELAS

DEPARTMENT OF THE AIR FORCE

PEACEKEEPER IN MINUTEMAN SILOS

ENVIRONMENTAL IMPACT STATEMENT PROCESS

PUBLIC HEARING

TRANSCRIPT OF HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties in interest, this matter came on regularly for hearing on the 2nd day of November, 1983, at the hour of 8:00 p.m., in the Cheyenne Civic Center Auditorium, Cheyenne, Wyoming. Colonel Allen Smith presiding.

Also present were Lieutenant Colonel Peter Walsh, Colonel Warren Hickman, Colonel Rees Padfield, Major Dave Taggart, Captain Mike McMullen, Mr. Fred Hickman and Dr. Richard Kramer.

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P R O C E E D I N G S

(Hearing Proceedings commenced 8:00 p.m., November 2, 1983.

COLONEL SMITH: Good evening. Welcome to this, the third of seven scheduled hearings in Wyoming and Nebraska on the draft environmental impact statement for the Peacekeeper in Minuteman silos program.

I am Colonel Allen Smith, an Air Force Trial Judge and I am the hearing officer. My role is simply to conduct the hearing. I have been involved in the development of the Peacekeeper Project and I will not be making any recommendations or decisions concerning it.

First on the agenda this evening will be an explanation of the peacekeeping project and a draft statement by Peter Walsh. Following his presentation, statements and comments from Government officials will be received. We will then have a short break.

After the break statements, comments of representatives or individuals will be accepted. We ask that all speakers limit their comments or statements to five minutes. Questions will be

answered by our team of experts and specialists. The hearing is scheduled to conclude at 11 p.m.

Now, to provide the greatest opportunity for all who wish to present comments or questions, we request you fill out a card available in the lobby. Speakers will be recognized from the floor only.

If time permits, and after all those registering to speak have had the opportunity to do so, if time does not permit you the opportunity to speak tonight, you certainly may submit written comments or statements.

This may be done by presenting such statements at the registration desk in the lobby or by mailing them to the address in the hearing handout.

That address will be on slide during the presentations. A Court Reporter is present this evening and a verbatim transcript of the entire hearing will be made. A video tape of the proceeding is also being made as a backup to the transcript to be sure the record is complete.

Captain Feeney is at the back of the room for the press and any questions that the press may have. We're now ready to have the briefing on the Peacekeeper Project and draft statement from

Lieutenant Colonel Walsh.

Colonel Walsh.

LIEUTENANT COLONEL WALSH: Good evening, ladies and gentlemen. I am Lieutenant Colonel Peter Walsh, the director of the Environment Planning Division for the Air Force Regional Civil Engineer at Norton Air Force Base.

In this position I am responsible for the preparation of the environmental impact statement for the Peacekeeper in Minuteman silos project.

Today I intend to summarize the major findings of the draft environmental impact statement issued on October the 14th for the project.

However, before reviewing the findings, I shall provide the background and context for the statement. Specifically, I shall cover the following subjects.

First, I shall review events leading to the presidental decision to deploy the Peacekeeper in Minuteman silos. Second, I shall briefly describe the project. Third, I shall describe the scope of the environmental impact statement.

Next, I shall describe the process and methods used in the preparation of the statement. This will be followed by an overview of the

principle findings.

Finally, I shall discuss future activities leading to the final environmental impact statement. The same briefing will be presented at all public hearings so everyone will receive the same information.

In accordance with the presidental decision of April the 19th, 1983, the Air Force plans to deploy the Peacekeeper Missile System within the 90th Strategic Missile Wing at F. E. Warren Air Force Base near Cheyenne, Wyoming.

In making this decision, the president was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the president on January the 3rd, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

The project described by the president entails replacement of 100 of the existing Minuteman III Missiles with 100 Peacekeeper Missiles in the 400th and 319th Strategic Missile Squadrons located near Cheyenne.

In order to implement this decision, the following actions are required. Modification of existing facilities and construction of new

facilities at F. E. Warren Air Force Base. Modification of 100 missile launch and ten launch control facilities in the aforementioned squadrons.

Installation of five additional buried cable systems connecting the two squadrons and upgrading the existing deployment area road network. The project will commence in early 1984 soon after the final environmental impact statement is filed.

Initial operational capability defined as the first ten operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989. Operations of the Peacekeeper will be similar to the Minuteman system. The major differences are in the transportation and emplacement of the missile.

The Minuteman stages are transported fully assembled and placed in the silo with the same vehicle. The Peacekeeper stages will be transported individually by one vehicle, and emplaced in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman system. Similarly, the Peacekeeper system will be as safe if not safer than the Minuteman system.

An accidental burning or detonating of a Minuteman has never occurred during any of its past 19 years of deployment. The Peacekeeper system has benefitted from this field experience as well as improvements in technology.

Development and use of insensitive high explosives in the Peacekeeper reentry system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command.

The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled system is less than one in ten trillion

Given the presidental decision and its implementation requirements, the Air Force prepared the draft environmental impact statement in accordance with the Council on Environmental Quality regulations.

The statement assesses the impacts of the deployment and peacetime operation of the system, alternative project elements, and the no-action

alternative of retaining the existing Minuteman III Missiles.

This statement does not cover the analyses of alternative basing modes, nor deployment locations for the Peacekeeper Missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the Jackson Amendment, exempted the president's report from the requirements of the National Environmental Policy Act.

Likewise, analyses of other basing modes such as super hardening of the protective structures, deep basing and ballistic missile defense are not included in the statement. They are not included because, first, they were not part of the president's decision.

Second, the Air Force does not intend to propose any of them in the foreseeable future and third, Peacekeeper deployment is not connected to any of these potential systems. Furthermore, the environment impacts of nuclear attack are not analyzed in the statement because the effects of war are speculative and lay beyond the scope of the Peacekeeper deployment and Peacekeeper operation.

Following the president's decision and subsequent approval by Congress, a notice of intent

to conduct the environmental impact statement process and a schedule for scoping meetings was published in the Federal Register on June 13th, 1983.

The scoping meetings were held between June the 27th and July 8th, 1983. Public meetings were held in Cheyenne, Pine Bluffs, Torrington and Wheatland, Wyoming and Kimball and Harrisburg, Nebraska.

Additional meetings were held with federal agencies in Denver, Colorado and Kansas City, Missouri, and with Nebraska state agencies in Lincoln, Nebraska. The purpose of these meetings was to obtain information for the preparation of the document.

Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental resource in a two step process. Study areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence.

Direct impacts are those which are directly

attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project. Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts.

These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analyzed within both the regions of influence and the areas of concentrated study. Four categories formed the framework for impact analysis. These are; area, timing, intensity and significance.

Area is defined as either site, local, or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site and region is the previously discussed region of influence for each resource.

Timing is defined as either short-term or

long-term. Short-term is the period from commencement of work until the system is fully operational. Long-term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission.

Intensity is defined as negligible, low, moderate or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during project planning or requires extensive action to mitigate.

Upon completion of the analysis, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages.

A set of 13 environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the document was published in the federal register on October the 14th. On that date the document was also available at libraries and federal, state and local agencies within the study area.

... this review I shall present a description of each resource study. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing and intensity of adverse impacts.

Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rationale for such judgment will be given.

You may follow my presentation by referring to the table on the inside of the handout made available to you as you entered the auditorium.

Employment demand. Employment demand describes the available regional labor force which may be used by the project, and demand for non-local labor which may result in the immigration of workers and their families.

The analysis indicates a short and long-term beneficial effect on the City of Cheyenne and the region of influence because of increases in employment and income.

During the peak employment years 1986 and 1987 approximately 3300 persons will be employed as a result of the project. There will be about 1800 direct and 1500 indirect jobs. Approximately 1000

of the 3300 jobs will be filled by people presently residing in the local area.

The balance of the personnel requirements will be filled through either immigration or weekly commuting.

When the system is fully operational there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

Housing. Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demand. Local, short and long-term beneficial effects result from potential increases in sales value and rental income due to increased housing demand in the Cheyenne urban area and the City of Kimball.

There is, however, an opposite effect on the consumer, particularly those on fixed income and first time home buyers.

The analysis indicates a local, short-term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the city of Kimball exceeds the projected net vacancy rate.

Also the market response would have to

exceed the highest historical annual production level. The analysis further indicates local, long-term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as out migration occurs.

During 1986 to 1990 the local short-term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

Public finance. Public finance describes the budgets, fiscal resources, and obligations of all major Governmental entities, including school districts and urban service areas.

The analysis indicates a local, short and long-term beneficial effect because of additional revenue to governmental entities due to increased sales and property taxes, and other taxes and fees.

The analysis further indicates local, short-term moderate impacts because many local governmental entities would face potential budget imbalances. This would require either an increase in revenues or a reduction in service-related expenditures during peak project activity.

The analysis also indicates local,

long-term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

Construction resources. Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, structural steel, reinforcing steel and steel rail.

The analysis indicates that regional short-term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analysis further indicates a regional short-term low impact resulting from the project's increased demand on regional production capacities of cement, aggregate, ballast, asphalt and roofing.

Social well-being. Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions, and selected indicators of behavior.

A local, short-term beneficial effect is anticipated due to the improved economy. The analysis indicates local, short-term, moderate

impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with the immigration of population.

The analysis further indicates that the local, short-term impacts were judged significant because the *population subgroups affected may not* be able to adjust or assimilate through existing institutional and informal social structures.

These groups include unsuccessful job seekers, adolescents and fixed income elderly.

Public services and facilities. Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety and welfare needs of citizens.

Included in this category are general government, education, law enforcement, criminal justice, fire protection, health care, human services and libraries.

The analysis indicates local, short-term moderate impacts. These impacts are due to a seven percent increase over what is projected for the student population without the project in Laramie County School District No. 1 in the peak year 1987.

Also contributing to the impacts is the need for additional firefighters, vehicles and space for the City of Cheyenne Fire Department. The need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne and the increased demand in health care and human services.

The analysis further indicates local, long-term moderate impacts are a result of the continued need for additional staffing and classroom space in Laramie County School District No. 1.

These impacts are also a result of the need for additional law enforcement in the City of Cheyenne.

The local, short-term impacts were judged significant because of overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control and the potential for human service needs that are unsatisfied.

Utilities. Utilities describes water treatment and distribution systems, waste water systems, solid waste systems, storm water facilities and telephone service. The analysis indicates that site, short-term low impacts are a result of further overloading of an existing sewer downstream of the F. E. Warren Air Force Base sewer and a need for

additional on base telephone equipment.

Local, short-term low impacts result from the further degradation of the performance of the existing waste water systems in the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and storm water facilities in the Cheyenne urban area as a result of new land development in the region.

The local short-term impacts were judged significant because of the overloaded operating condition of the waste water systems in the Cheyenne urban area and in Torrington will be aggravated.

Energy resources. Energy resources include the supply and distribution systems for electrical power, natural gas, petroleum fuel and coal. The analysis indicates local, short-term moderate impacts as a result of the need to expand the capacity of a local electrical substation servicing F. E. Warren Air Force Base by about 40 percent.

Local long-term impacts result from increased energy demands. The analysis also indicates regional, short-term low impacts as a result of the depletion of non-renewable energy resources from the construction phase of the project.

Regional, long-term, low impacts are a result of the depletion of non-renewable energy resources by the Peacekeeper operating personnel.

Transportation. Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design and operation of roads, railroads, aviation facilities, public transit and pedestrian and bicycle facilities.

A long-term beneficial effect is anticipated due to the improvements to roads and bridges at the site, local and regional levels.

The analysis indicates site, short-term, low impacts as a result of construction activities on or near roads in the deployment area.

- Local, short-term moderate impacts are indicated as a result of reductions in the level of service at 13 of 26 impacted intersections and interchanges in the Cheyenne urban area.

This is because of the expected conjestion at the F. E. Warren Air Force Base Randall Avenue gate due to the influx of construction workers and materials onto the base.

The analysis further indicates regional, short-term, low impacts as a result of existing

capacity constraints and increased demand at Cheyenne airport.

The site short-term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternative travel routes.

Local short-term moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land use. Land use comprises both urban land uses in developed communities where population immigration is expected and rural land uses in the deployment area where direct impacts from project development would occur.

A local, long-term beneficial effect may occur from the infill of vacant areas within the city boundaries of Cheyenne and Kimball.

The analysis indicates site short-term low impacts are a result of the temporary interuptions of agricultural land use during cable trenching.

The site long-term low impacts as a result

of restrictions on residential land use within explosive safety zones. The analysis also indicates local short-term low impacts are a result of the underutilization of land developed to support mobile homes beginning in 1987 as out migration begins.

Local, long-term low impacts are a result of the continuing underutilization of land developed to support mobile homes.

Recreation. Recreation includes regional resource base recreation which is related to federal, state and other lands offering rural outdoor recreational opportunities and local, user-based recreation which is related to municipal and county owned parks and facilities within urbanized areas.

The analysis indicates local, short-term moderate impacts as a result of increased demand for park land, facilities and staffing. The analysis also indicates local, long-term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreational system requiring additional expenditures for operations and maintenance.

The analysis further indicates regional, short-term moderate impacts primarily as a result of increased demand at Medicine Bow National Forest and

Curt Gowdy, Glendo and Guernsey State Parks.

These regional impacts become low in the long-term due to the reduction in the number of users when out migration occurs. Local, short-term moderate impacts were judged significant because of the need to seek funding outside the normal budgetary process in order to provide additional local park land and recreational facilities.

Regional short-term moderate impacts were judged significant because the additional use of regional recreational facilities will exacerbate an existing overcrowded situation thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

Cultural resources. Cultural resources include four separate elements: paleontological, pre-historic, historic and American Indian cultural resources.

The analysis indicates site, short-term moderate impacts as a result of ground disturbing activities associated with Peacekeeper deployment that may affect historic and prehistoric sites.

The analysis also indicates site, long-term low impacts as a result of the use of buildings at F. E. Warren Air Force base currently listed on the

national register of historic places.

Visual resources. Visual resources include scenic resources and the visual environment as well as an evaluation of the visual quality of the region. The analysis indicates site, short-term, low impacts due to clearing of vegetation and grading activities during construction.

Water resources. Water resources include ground water hydrology and quality, surface water hydrology and quality, water use and demand and constraints on water use.

The analysis indicates site, short-term low impacts on the F. E. Warren Air Force Base launch facilities and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology.

Site, long-term low impacts are a result of permanent changes to storm water runoff characteristics. The analysis also indicates local short-term moderate impacts because induced water demand exceeds the projected capacity of the existing delivery system for the Cheyenne urban area.

Local long-term, low impacts are predicted because of increased water demands, increased surface runoff and increased erosion and

sedimentation in the Cheyenne urban area.

Regional short-term, low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development.

The local, short-term moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

Biological resources. Biological resources include vegetation, wildlife, fisheries and unique and sensitive habitats. The analysis indicates site, short-term moderate impacts as a result of the potential immediate disruption by construction or modification activities of riparian vegetation and wildlife habitats.

The analysis also indicates site, long-term, moderate impacts as a result of construction activities that may potentially disrupt trees and shrubs in riparian and wetland habitats that have a long recovery period.

The analysis further indicates that there are regional short-term moderate impacts. These are the results of general recreational pressures, poaching, dog kills and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy

State Park.

Regional long-term low impacts are as a result of the random shooting of the Swainson's hawk and other birds of prey. The site short-term moderate impacts were judged significant because of the limited extent of the riparian and wetland habitats. The site, long-term moderate impacts were judged significant because of the long recovery periods of riparian vegetation.

Regional short-term moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased human activities on big game in areas of concentrated recreational pressures.

Regional long-term low impacts were judged significant because of concerns over declining populations of some species of birds of prey.

Threatened and endangered species. Threatened and endangered species include plants, wildlife and aquatic species which are protected by federal law as threatened or endangered.

Also included in this category are state protected rare, threatened or endangered species. Although state species are not afforded the same protection as federally listed species they were

included because of special state concern.

The analysis indicates site, short-term high impacts as a result of the disturbance of the habitat of the Colorado butterfly plant and the wooly milkvetch. Site high impact will continue in the long-term as a result of the loss of habitat for the Colorado butterfly plant

The analysis further indicates regional, short-term, low impacts as a result of the potential for random shooting of the bald eagle and accidental catching of the greenback cutthroat trout.

Regional long-term low impacts are a result of the continuing potential for random shooting of the bald eagle. All of these impacts were judged significant because the bald eagle and the greenback cutthroat trout are federally listed endangered species.

Also the Colorado butterfly plant is categorized as a category one species by the U. S. Fish and Wildlife Service and the wooly milkvetch is listed as rare by the Wyoming Natural Heritage Program.

Geologic resources. Geologic resources include geological hazards, energy and mineral resources including aggregate and soil resources.

The analysis indicates site, short-term low impacts as a result of the potential for soil erosion during construction activities.

The analysis further indicates local short-term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading.

The analysis also indicates local long-term low impacts resulting from a need for aggregate resources for road maintenance.

Noise. Noise analysis includes vehicular, air and railroad transportation and construction activity. The analysis indicates that the impacts will be negligible.

Air quality. Air quality describes the effects of project construction, operation and related transportation activities upon future air quality. The analysis indicates local, short-term low impacts.

These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a result of construction activities.

As previously discussed project

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alternatives were analyzed. These analyses focused on alternative road configurations, cable routes and staging areas. The analyses have demonstrated that for most of the resources the level of impact is either negligible or low and not significant and does not vary within each of the three sets of project element alternatives.

For four resource areas: transportation, land use, cultural resources and biological resource areas there are variations in the level of impact among alternatives.

I shall summarize these. As shown on this slide three alternative egress routes from transporting the Peacekeeper stages from the base were considered.

Alternative R-2, which is the proposed action, is designed to allow all northbound stage transporter travel to exit the base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive.

This requires realignment of Happy Jack Road and removal of the existing Happy Jack Bridge. Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road bridge clearance problems and the egress of the stage transporter at Central

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Avenue interchange and at the Missile Drive interchange to travel north or south.

Alternative R-3 involves providing stage transporter access to Interstate 80 via Roundtop Road which would require new on/off ramps at Interstate 80. Access to the north would still be via Interstate 25 near the Central Avenue interchange.

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads off base, in addition to new on/off ramps at Interstate 80. This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Roundtop Road may tend to stimulate urban development west of F. E. Warren Air Force base which would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transporter route has the potential for intersecting cultural properties eligible for the national register of historic places.

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In addition, all three alternatives have a high and significant impact on the habitat of the Colorado butterfly plant because of potential disturbance during the construction phase of the project.

This impact was judged significant because of the U. S. Fish and Wild Life Service's category one classification of the plant species.

For the project five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corridors have been identified for environmental analyses.

Three alternatives follow overland routes. Two of these follow easements previously obtained by the Air Force for communication cables. One alternative follows an existing road right of way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right of way.

Impacts among the alternative cable paths did not vary appreciably with the exception of land use, cultural resources and biological resources.

The alternative totally along the road right of way would have a negligible land use impact.

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The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to documented presence of archaeological sites in the area which the cable would traverse and high probability these routes would destroy additional presently unrecorded sites.

The remaining four routes have been assigned a low or moderate impact, based upon the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing critical raptor, riparian or aquatic habitats. Four of the seven alternatives would have moderate impacts, while the other three would be low impacts.

The differences are due to the expected frequency of encountering the critical habitats. These were judged significant because of the limited areas of these habitats.

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as

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a temporary field storage and administrative center.

The proposed action would have staging areas located on the base and in Cheyenne, Wyoming and Kimball, Nebraska. An alternative would have temporary support areas only on the base and Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered did not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the proposed action that includes a staging area in Kimball, because of the potential of congestion on community roads.

Similarly, impacts on cultural resources would be low for the proposals that include staging areas on the base because of the presence of prehistoric and historic cultural resources.

In conclusion the draft environmental impact statement projects beneficial effects in employment demand, housing, public finance, construction resources, social well-being, transportation and land use.

It further predicts that without further

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mitigation actions there would be significant adverse impacts in housing, social well-being, public services, and facilities, and utilities, transportation, recreation, water resources, biological resources and threatened and endangered species.

To the extent practicable standard practices that could avoid, reduce or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures which could be used to reduce impacts have been identified.

These include requesting funds through existing federal impact aid to school districts to Laramie County School District No. 1. The Department of Defense and Wyoming and Nebraska Governmental entities have agreed to enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense, which will mitigate adverse impacts resulting from the project.

The statements, comments and questions provided during the public hearings and written comments postmarked by November the 28th, 1983 will be analyzed. After the close of the comment period the Air Force will review and evaluate all inputs to

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determine how they should be responded to and the need for revisions to the analysis contained in the draft statement.

The completion of this work will result in the development of the final environmental impact statement to be released by January 31st, 1984.

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this evening.

This completes the briefing portion of the hearing. I shall now turn the program back to Colonel Smith.

COLONEL SMITH: Thank you very much, sir. We would now like to introduce the key members that assist Colonel Walsh in responding to questions and comments this evening. We have Colonel Warren Hickman who is site activation task commander at F. E. Warren Air Force Base. Colonel Rees Patfield who is the assistant chief of requirements, integration division of the ballistic missile office at Norton Air Force Base.

Next we have Major Dave Taggart who is the staff judge advocate of the regional civil engineer,

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Norton Air Force base, California. We have Captain Mike McMullen, headquarters peacekeeper liaison, in Cheyenne.

Mr. Fred Hickman who is the human resources director for URS-Berger, San Bernadino, California. Finally we have Dr. Dick Kramer who is the Natural Resources Director for URS-Berger, San Bernadino, California.

That is the team that we have to respond to questions.

I have several public officials that are present this evening that would like to make statements. First, I have John Rogers who is subcommittee chairman and Chamber of Commerce chairman.

Good evening, sir. We have two microphones at the back or up here at the podium, whichever is easier.

218 MR. ROGERS: Thank you. My name is John Rogers and I'm chairman of the Peacekeeper Task Force of the greater Cheyenne Chamber of Commerce. This committee is the economic committee of the Mayor's impact team.

The Task Force was organized by the Chamber in 1982 and consists of 20 members from all aspects

of the community including business, labor, education and finance.

I would first like to compliment the Air Force and its consultant for the dramatic improved quality of the draft environmental impact statement compared to the Wyoming-Nebraska socio-economic impact study which was published about a month ago.

The DEIS does, as has already been indicated, identify significant impacts in our community in the areas of housing, social well-being, public services, transportation, recreation and water. I would add to that list employment opportunities and I'll explain that in a minute.

However, at this point let me observe that that is really the substance of our community and it does indicate significant impacts in all of the major areas of concern to our community.

With regard to the question of employment I question the criteria used by the consultant for determining the significance of impacts in this particular area. The chosen criteria is a one percent change in the rate of unemployment. 233

This suggests that that is the only objective criteria for determining impact in the community in this area. I would suggest that the

number of persons required to immigrate in order to satisfy the project employment demand is an equally important criteria.

Surely recent experience in Wyoming and other states experiencing energy development should supply some threshhold level at which a certain percentage increase in a community's population over a short period of time results in a significant impact. 233

However, even when one percent unemployment increase or decrease test is used I would point out that table 3.1.1-4 demonstrates that there will be a 99 percent change in unemployment rate in the year 1985

This misses the test of significance by a mere one-tenth of one percent. I think that's a fine hair to split.

We agree that a large proportion of the road and construction jobs as indicated in the report can be filled by local workers. However, to assume that all of these jobs will be so filled as the report does is perhaps to assume too much. 149

In this regard it is extremely important that the Air Force bid these jobs on a size that will allow local contractors to compete successfully If jobs are that local contractors are unable to bid

the local hiring will be less reliable.

The assumption in the report that commuter labor is the same as local labor should be carefully considered. Consumers will consume community services during their time in Cheyenne, but most likely will do the majority of their saving and spending in their home community, thus, contributing fairly little to the local economy. 421

I would hope that the final environmental impact statement will contain a better and more complete analysis of the nature and potential mitigation requirements for the problem of transient unskilled labor coming into the community looking for jobs. 497

It's not enough merely to acknowledge this problem as "unavoidable" as is done in the draft environmental impact statement, because our committee would heartily endorse the recommendation for job training and referral programs to have participation by the local labor force.

This will require a greater degree of detail from the information of the Air Force, as the nature of the job skills required, so that local training and job placement agencies can complete advance planning for these kinds of efforts. 236

Of particular importance in the DEIS is the apparent need for 62 mobile homes or other similar temporary housing units versus the 61 units currently available in the local market. This corresponds with the 712 excess units that the report projects during the decline cycle.

These observations in the report are consistent with the observations by the Chamber in their recommendations published in June of this year. At this time the Chamber asked that local merchants plan for temporary impact of some 1,000 persons rather than the 4800 persons, using the current DEIS figures. 328

The DEIS housing analysis suggests a critical need for an early decision concerning the frequently mentioned mitigation measure of a centralized short-term worker housing complex.

This could decline the impact of excess housing units in the private market while affording a legitimate role in the private sector. 320

With proper planning such a complex might also provide concurrent long-term benefit to the community if it could be converted to a legitimate community, need at the conclusion of the Peacekeeper Project.

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In the area of public finance I would call particular attention to the mitigation measure recommended at page 3-72, that all project related purchases of supplies, materials and equipment be made by contractors rather than through Department of Defense, Air Force, Regional Civil Engineers, purchasing. 458

The Chamber obviously endorses this as recommendation both for its beneficial impact on public finances as well as its impact on the local economy.

I'm somewhat concerned about the measure of impact with regard to the availability of construction materials. The report deals strictly with the supply aspects of the availability of construction materials. I think our experience indicates that there might be some dislocation in the local market primarily having to deal with access to supply. 459

We are somewhat concerned that smaller purchasers will not have the competitive advantages of large purchasers for large amounts of materials, and therefore, there will be some shortages of materials because of being outbid, basically by large purchasers.

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And I think this deserves more analysis from the access side to the market as well as the supply side. 459

I won't comment at length on the social well-being area except to note that we do endorse the proposed mitigation measures of an aggressive media program to discourage speculative relocation of laborers to the community and to provide a planned phase-out program to deal with the decline cycle of the project. 234

One area in which we are particularly concerned is the lack of analysis in the DEIS and also in the WEMSIS in regard to the private sector of the economy. We feel some consideration should be given to that.

One excellent example is in the area of recreational resources. The report deals with parks and ballfields provided by the governmental sector. It does not deal with the needs for things such as movie theaters, bowling alleys and other private sector kinds of things, recreational activities that are equally important. 422

There is an overriding issue and that has to do with lead time necessary for response to impact. This could be the most important single 89

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issue to be addressed. Our understanding is the that federal budgets for fiscal year 1984 are already completed and that the process for development of budgets for fiscal year 1985 is substantially under way.

If this community is going to be in a position to respond to potential impacts, especially with major intrastructure projects they will have to be on line, planned, funded and constructed prior to fiscal year 1986. That gives us a very short period of time to deal with the potential problems of mitigation. 89

Finally, I would like to observe personally that I believe and I think the Chamber believes that the majority of the residents of the City of Cheyenne are willing to accept their legitimate role in playing host to what the Congress and the administration have determined to be a necessary project for the nation's defense.

However, the city and its surrounding area are entitled to reasonable financial assistance to mitigate the impact of its role in the construction and operation of the Peacekeeper Missile system. 87

The highly charged political atmosphere surrounding the Peacekeeper Project, the suspicion

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by many members of Congress that Wyoming and the west are wealthy and not deserving of significant financial assistance, the belief that population growth and resulting growth in the economy are mitigation enough and the tendency to discount impact estimates is overall intent to make the prospect of significant impact assistance increasingly remote. 87

This makes the DEIS an especially important document. Because it will provide a realistic informed analysis of the needs of the community and reasonable measures required for impact.

We sincerely appreciate the opportunity to present these comments to you and we will provide you with a more detailed set of written comments within the next day.

COLONEL SMITH: Thank you very much, sir.

Our next speaker is Barbara Rogers, a subcommittee chairman on the impact team.

224 MRS. ROGERS: My name is Barbara Rogers, I'm chairman of the Heritage Values and Well-being Subcommittee of the Mayor's Impact Team.

You have the opportunity this afternoon to hear presentations by two of our subcommittee

members, one was Dick Palma, our staff member and the other was Father Eugene Todd. Both of them spoke eloquently of human needs.

I will not repeat their comments but I would like to emphasize and highlight the six major points that our committee wishes to make regarding the DEIS.

Number one, in spite of a massive number of documents inundating us, no coherent sense of what will happen or what will be needed relative to MX impacts has emerged.

The Heritage Values and Well-being committee believes that the community must understand the change which will occur as a result of the project in order to organize itself to cope. Responsibility for developing this understanding belongs both with the community and with the Air Force.

While the DEIS identifies some expected changes within a number of issue areas there are still some gaps. We need a more coordinated and manageable description of what these changes will mean to community life patterns and we need it immediately if the community is to be able to manage its own future.

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Number two, our subcommittee has been most concerned with human needs. And these are often given a lower priority when there are more qualifiable and easily measured issues to consider.

Although the ultimate purpose for deploying MX missiles is said to be the preservation of the national quality of life, local quality of life is receiving more superficial attention. Particularly with regard to the DEIS definitions impacts are structured in such a way that no impacts on community well-being can be high.

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Apparently the highest level of impact we would ever receive would be moderate. This ranking really reflects more wishful thinking than actual fact.

The committee would argue with the assumption that because Cheyenne has experienced impact before, therefore, subsequent projects cannot create high impact. Of course, they can.

Number three, our committee would guess in the absence of hard data that human services in Cheyenne and Laramie County are not meeting today's needs. And further, that they will be overwhelmed by the influx of 5,000 people.

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Our committee is deeply concerned about the

number of transients who will come to Cheyenne. Those looking for work and requiring emergency shelter will increase dramatically as a result of the MX project.

We do not currently have the structure inlays to deal with this eventuality. Who will develop it and who will pay for it? Neither the DEIS or the WEMSIS deals with this issue adequately.

Furthermore, as housing and other basic resources become scarce we feel that inflationary pressures seriously impact low and mid-income citizens.

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Why should they suffer and how can we soft the blow? Again the DEIS did not deal with that. An assessment within the human needs of the community needs to undertaken immediately. This needs assessment must include an honest appraisal whether or not the community is to fulfill its responsibility to its citizens.

Once that's completed a permanent system for moderating changes should be developed. We commend the Air Force and consultants for recognizing the importance of assessing these and monitoring impacts, because they recommend both activities as mitigation measures in the DEIS.

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However, neither assessment nor monitoring will actually mitigate impacts. To give meaning to these activities a mechanism for timing response to needs must exist.

Therefore, we recommend a fund be established from which support for human services can be drawn when urgent needs are identified.

We will not have the luxury of the months and years of time that it takes to obtain federal monies through regular channels when a critical development problem surfaces. We suggest such an approach of a fund would allow the community to meet needs without overfunding some services and shortchanging others.

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Number five, impact mitigation activities must also be directed at the time when MX construction slows down. The DEIS pays inadequate attention to this phase of the project and the time following project completion.

Demands on many public services and private services will decrease, yet we expect demands on human services to increase or continue in this period.

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We as a community must be assured we will have the wherewithal to respond to these problems

during the decline circle.

Finally, a personal point. I have been told that Wheatland, Wyoming, when faced with impact from the construction of a major power generation plant was granted $30 million in upfront money by the Missouri Basin Power project. To date by comparison Cheyenne has received $70,000 to do our job.

Surely our community deserves better than this and as you recall the Air Force can help us in our quest. Thank you for your attention.

COLONEL SMITH: Thank you very much, ma'am.

Our next speaker that we have this evening is Robin Volk, also a member of the impact team.

225 MS. VOLK: To wade through all of this data is sort of like riding a bucking horse for the first time. You have to take a deep seat and a long rein and I hate to encumber you with more remarks but I challenge you to take a deep seat and a long rein.

I'm Robin Volk from the Heritage Values and Well-being subcommittee. These are our prepared comments and I hope you will bear with me.

The Air Force draft environmental impact statement does not pull together a coherent sense of how the community will be affected by MX development. If the community is to cope effectively with impact it must understand the scope of the project.

Once the extent of the impact is clear local citizens can organize to set priorities for directing growth and for preserving the qualities or the community's qualities of life.

Developing this understanding and knowledge among local residents is the responsibility of both the community and the Air Force. The draft environmental impact statement should be amended to provide a more coordinated description of how community life and patterns will be changed because of the project.

The Heritage, Values and Well-being subcommittee is seriously concerned with human needs and the priority attached to them. Although the avowed purpose for deploying MX missiles is to preserve the national quality of life, local quality of life is being given relatively superficial attention.

The environmental impact statement precludes any conclusion that impacts on community well-being will be high. That was the large round black dot we didn't see too much of on the screen. They defined high impact as a situation in which similar changes have not occurred in the past.

Neither local policy nor the Air Force impact studies demonstrate adequate concern with well-being issues. Virtual local human service agencies will be affected by the MX project.

A number of transients looking for work and requiring emergency food and shelter will increase dramatically as housing and other resources become scarce in relation to demand. Inflationary pressures will seriously impact low or fixed income people.

As employment opportunities increase the pool of volunteers to assist in meeting human needs will be reduced. The draft environmental impact statement addresses these and other human needs but it does not provide for adequate mitigation given the anticipated extent of the impact.

Furthermore, the EIS does not recognize the impacted mitigation must be timely if it is to be effective. Changing the way services are provided takes time. Yet the peak of impact is expected within three years. Environmental impact statements must include recommendations for assuring mitigation takes place when it is needed.

Human services in Cheyenne and Laramie County are unable to meet today's needs and will be overwhelmed by an increase in the pace of population growth. Human service priorities must be able to respond to MX impact.

Three activities are essential in equipping them to do so. First, there must be a clear understanding of what the community's human needs are and how they are being met. And immediate needs assessment is imparative.

The assessment must include an honest appraisal of whether or not the community is fulfilling its responsibility to its citizens.

Second, there must be a continuous monitoring of changing needs and the ability of the community to deal with these changes. A permanent ongoing monitoring system must be instituted.

We commend the Air Force and its consultant for recognizing the importance of assessing needs and monitoring impacts by recommending both as mitigation measures in environmental impact statement.

Neither assessment nor monitoring, however, will mitigate impacts. There must be a way for the community to be sure it can cope. There must be

away for the community to be sure it can cope in time with needs identified during assessment and monitoring. We recommend that a fund be established from which support for human services can be drawn when urgent needs are recognized.

This is the most appropriate mitigation measure for issue areas in which the range of MX impacts is difficult to quantify. It allows the community to cope with change without overfunding some services and shortchanging others.

The EIS should recommend that a drawdown fund should be established as an integral part of the recommended monitoring program. The monitoring program and the drawdown fund should be administered jointly by the Air Force and the local community.

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If both groups work together the Air Force will be assured that mitigation monies are being spent in response to project related impacts.

The community will bear the responsibility for setting priorities and coordinating local services.

The assessment, monitoring and drawdown fund process is one which should be considered for areas of impact other than human services as well. It provides a reasoned approach to dealing with

impacts. This is preferable to requiring the community to guess what its needs will be before baseline needs are assessed and before the scope of the project is clarified.

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The environmental impact statement pays inadequate attention to the time after the peak MX construction. Demands on human services will continue or increase during this period.

For example, nearly half of the mental health center's clients are unemployed persons. The monitoring system including Air Force participation will be essential to understanding problems arising during the bust cycle.

The drawdown fund must be applicable to the post-construction period. Decision makers must be given tools to manage change. The long range complications of actions must be built into their day-to-day activities. Priorities are not being explicitly set.

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As a result, they are set by default. Because of the immediacy of the expected impact we must clarify issues and set priorities now. Only by doing so can we assure that mitigation monies will be sufficient to deal with the most important issues and applied where they are needed.

The Air Force should recognize this activity as central to the mitigation process and should focus attention on it in the environmental impact statement as a mitigation measure.

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In conclusion, the subcommittee argues a more direct approach to solving community problem needs to be followed. The focus must first be on the lives being affected, followed by a concerted effort to generate solutions, meaningful at the personal level.

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The Air Force and local leadership working together must immediately create a forum to build a community consensus about the impact issue.

Thank you very much. I'm speaking on behalf of Lawrence Anderson, Rick Bryant, Pat Fleming, Jim Hecker, Ron Roger, Bob Stewart, Dick Palma, Larry Birleffi, Shirley Kirkbride, Eugene Todd and Dennis Kahelo.

COLONEL SMITH: Thank you, ma'am.

The next speaker that we have is Virgil Slough, chairman of the Mayor's Impact Committee.

214 MR. SLOUGH: As you can tell, the Impact Committee has been at work for over a year. We have 17 committees composed of about 300 people that have studied all of the information the Air

Force has presented to them and I believe some of the statements they have made bear further investigation and I'm sure the Air Force will give us that service.

Throughout all of the subcommittee statements that were made three major areas of impact seem to be outstanding and come to light in all of their statements. We feel that in the Cheyenne, Laramie County area the cause will be the accelerated growth we expect to receive in a three year period that normally would come to Cheyenne in a ten year growth period.

We feel that in the ten year growth period the City of Cheyenne, Laramie County could cope with this problem. Maybe not as well as they should but effectively. The governmental services and human services which normally would be planned over this ten year period will be needed in less than three years.

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There will be only a third of the money available to handle these needs. These accelerated programs also normally cost more money than a normal growth pattern, so that an excess of money will be needed in the first three years to adequately handle the things that will be forced upon Cheyenne because

of the displacement of the Peacekeeper Missile.

Some of the examples of the services affected, of course, you have mentioned in the impact statement. They are police, fire, hospital, health, welfare, school, water, sewer and streets. The social or human services which are pointed out in the impact statement as lacking or undetermined have in recent years be improved upon in the City of Cheyenne and Laramie County.

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We would hope to continue the improvement of these services to our citizens and we only hope that the influx of all the people connected with the missile placement will completely make the services ineffective.

We are sure you will consider this as one of your main concerns. The second concern I think that has been expressed throughout all of this is housing. The type not only to accomodate the immediate need but to be of utility and value to the community after completion of the project.

And examples have been stated where these could be built in the form of apartment houses that could be renovated and left for community use such as retirement housing, limited health care facilities, homes for the aged, medical family

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housing for those people that have patients in the hospitals or for college dormitories.

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We hope you will take this into consideration and not leave us with something that we would have to destroy. The expeditious availability of mitigating funds is a third item I think everyone is very much concerned with.

In order to accomodate the people's needs now and during the project and after the project is completed, we feel that every effort should be made at this time to draw upon what funds are available and let the people in Cheyenne know what we can have to take care of those problems during this three year period where the shortage will fall.

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We are confident these concerns and others pointed out by the subcommittees will be addressed and steps will be taken to mitigate the adverse affects by you, the Air Force.

Thank you very much.

COLONEL SMITH: Thank you, sir. Our next speaker is Mr. Ron Rogers, City Councilman, Ward One, City of Cheyenne.

188 MR. ROGERS: Thank you. This building here is not paid for. I wonder if the Air Force would be interested in coming in this one.

You might want to view my comments from a couple perspectives. I have at one time or another publicly opposed the racetrack and the Densepack and I guess I'm still a little bit skeptical about the deployment in Minuteman silos partly from a general feeling that just from reading the newspapers that there seems to be a lot of disagreement in professionals even as to whether or not it's something we should be spending this kind of money on.

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But also from the kind of angle that I've also be afraid the negative impacts on the community would outweigh the benefits somehow. And also I grew up out east of town here not too far from what you gentlemen might know as A-6. It's a Minuteman missile site.

There's kind of a folklore down country that suggests if you go to the Burns poolhall you can probably get somebody to -- I think the smart money would say if they ever fired them half of them won't make it out of the silo.

But I didn't come to talk about the merits of the proposal. I've also said publically that I feel that my role as a public official in this particular issue is to let Congress make the

decision and see if I can do what I can to make sure that the benefits and burdens of the project are shared as equally as possible by everybody in the community.

And I am, for whatever it's worth, a Viet Nam veteran. I am not ashamed of that fact. I think it's helped me a little bit, I consider myself to be fairly patriotic.

And I did volunteer to serve on one of the impact committees but after I did it I decided I probably should stay away from it and kind of let the members of the committee make recommendations without the benefit of my participation as a public official.

And I have concluded that, as a matter of fact, the committee was the Heritage Values and Social Well-being Committee, and I was somewhat surprised after the months of their consideration that the comments that they have submitted to you I believe pretty much summarize what I suspected all along would be some of the major issues.

And I heartily endorse the comments that have been submitted.

The draft EIS in my opinion is a fairly good collection of interesting data. I learned

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quite a bit from reading it myself.

However, I had the feeling all the way through it that somehow the essence of what the community of Cheyenne is and the impact that a project of this nature has on the community like Cheyenne, which is fairly unique, somehow kind of got lost. 44

And I have heard other people here this evening say it, I think in slightly different terms, that there wasn't a cohesive description of what will happen. I had the opportunity for about four years in the mid 1970s to be involved in direct human services delivery work in Campbell, Johnson, Sheridan, Sweetwater, Fremont Counties, among others, at a time when those areas were undergoing significant impact as a result of energy development and I think that that qualifies me, to some degree, anyway, to speak on what the kind of influx that we're talking about here has on a rural community.

And I think, to sum it up, I think it's fair to say and I think it's supported by the comments of the various impact committees that the draft EIS is a general kind of rule and generally understates the negative impacts of the proposed action and I would hope one of the things 36

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specifically I will say in that regard I share the concern with the definition that is given to major significant adverse impact.

Somebody used the term Catch-22. It virtually eliminates the possibility that that major impact will be found and I would heartily urge that the Air Force to take a real close look at that particular criteria. 36

There are a couple other specific things that were of some concern to me. There is a suggestion in the draft EIS that the city, I believe the word is loosened certain development standards in order to help facilitate the rapid kind of development that's going to need to take place in order to assure adequate housing and so forth.

I would have to strongly argue against that. I think it's arguable that right now city and county governments are having to spend considerable amounts of time and money to correct problems that were created because we either loosen standards or did not have standards, those standards in place during the last major boom cycle when the Minuteman was brought in. 335

And I can cite specific examples. The houses in Buffalo Ridge were built, many of them

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during that economic boom period and we're faced with a prospect of a multi-million dollar drainage improvement up there. Generally I don't think it's a good idea to lessen your standards.

If anything, I think we need to make sure we tighten them up so that we don't face any problems down the line and I would hate to see the community or the Air Force or anyone else be in a position of assuming that the City-County Planning Commission or the governing authorities will go along with that kind of an adjustment. 335

In my opinion I have a major concern. I tend to look at this project in terms of the national economy and I had to chuckle when I read in the draft EIS that the mitigation proposed that we launch a media campaign of some sort to discourage people from coming out to Wyoming looking for a job. 234

And I had to think of Alaska and I know that Alaska spent a lot of money on that kind of project to keep people from coming up there to get a job on the pipeline and that it didn't work.

I would suggest to the community and to the Air Force that the kind of money that you would spend on that kind of media program would be much better spent actually providing the services. 551

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I think we must assume because it has been going on for some time now already, we've had a lot of people coming into Cheyenne assuming that there's a coal mine or a drilling rig somewhere around here that they can hire on.

I think we have to assume these people are going to come. I think we're going to have to assume that a large number of them will not have the skills that the Air Force needs for the available jobs, and I think we have to be in a position to make sure that it is services, not only in terms of human services. And in terms of law enforcement, housing across the board can be met and can be met rapidly. 551

And I would heartily endorse again the notion that we need to have a fund that is available for rapid response to human services needs in particular. 88

In conclusion, I mentioned earlier what I thought maybe what my role might be in terms of trying to help distribute benefits and burdens. I really kind of feel even though, you know, I've been kind of a -- I've taken pot shots at the MX project program every chance I got.

I think here in Cheyenne, historically,

we've been pretty good to the military dating back practically to territorial times. We've had, I guess sort of a love-hate relationship that probably every military base shares with every community they live in.

But by in large I think the people around here are receptive to Air Force and military. I myself lived in a neighborhood that has a lot of Air Force people. My boy's best friend's dad is in the Air Force and I perceive that the Air Force has made an excellent effort to participate in the community.

I know practically every board that I've participated on, whether it be a voluntary agency or direct human services delivery, you name it, there have been Air Force officers and enlisted men that have volunteered their time to participate in these activities. And I know the community appreciates this. I certainly do.

The problem I see and what I'm asking for here is that, as I've said I think this draft EIS kind of understates the impact. I don't think I can be as eloquent as John Rogers who said it a little bit differently; I hope the Air Force doesn't take the draft EIS and this particular definition of impacts, which I think locks us out in some way, and

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uses that as a way to keep from putting some money into this community -- that we really do need.

You have to understand that Cheyenne is sitting down here, we haven't got the big mineral money that a lot of places have, and if you compare our municipal budget and our county budget with communities of similar size or even smaller size, around the state, you'll see we're kind of scraping by here and largely it's because we don't have the tax base that some of these other areas have.

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We need some real help to make sure that ten years from now my original fear is not borne out, that the negative is going to outweigh the positive. We would like it to be a positive project for the community and for the country if the country's going to go ahead and build it.

I know in my ward, which is the south side, and the west side, there are a lot of people that I come in contact with who are very much in favor of the MX coming into Cheyenne, because they or their parents were able to leave poverty really and join the middle class and become homeowners because of the opportunities that were afforded to them when the Minuteman was demployed in the Cheyenne area.

I hope that that same fulfillment can

result from the deployment of the MX here. And I think we're going to need the cooperation of the Air Force in order for that to happen. Thank you.

COLONEL SMITH: Thank you very much, sir.

That's the end of the statements that we have from elected and appointed officials. We're going to recess for about 10 minutes. When we return we'll have statements and comments from representatives and groups and individuals. So let's recess for about 10 minutes.

(Hearing Proceedings recessed 9:30 p.m., November 2, 1983.)

(Hearing Proceedings commenced 9:45 p.m., November 2, 1983.)

COLONEL SMITH: We will continue the meeting. We ask you limit your comments and statements to three minutes. Our first speaker this evening is Dr. Richard Gardiner who is the Midwest Regional Director for Physicians for Social Responsibility.

Doctor Gardiner.

284 DR. GARDINER: Thank you. I'm here as

a physician. I'm a professional radiologist at Rush Medical College in Chicago on a consultation. And the consultation is what would be the environmental impact of placing 100 MX missiles in this part of the country.

I'm also here as a representative of Physicians for Social Responsibility which is a group of 20,000 doctors in this country and I'm speaking on behalf of this organization here tonight. We have chapters in 180 cities around the country and we're deeply concerned with the MX missile and its impact on our environment.

I'm also here as a father of two teenagers, as a proud citizen of this country and as someone who believes in the democratic process. Someone who believes that when the Congress yesterday, had five Congress representatives voted the other way -- just five had changed their votes -- it would be a completely different tune here today; someone that recognizes the democratic process involves community activism, people taking responsibility for themselves in and the environment in which they live.

Just like a physician doesn't stop working and hoping and doing everything in her or his power for the patient while the patient is alive,

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I believe that the citizens of this community and this community extends all the way around the globe, not just in one corner of one state when we're dealing with weapons as powerful as the MX missile and the result of what would happen if these missiles were ever launched or if an attack were ever launched upon those communications -- the community extends all the way around the country -- and the environmental impact is not one that would be limited to whether we have a traffic jam here in Cheyenne but what would be the affect on the world. 37

Well, I lived like we all did under deterents for 30-odd years saying we had these weapons to prevent nuclear war. But we're all aware our government has changed its tune. The tune is now changed and we have the weapons not merely to deter nuclear war but to fight a nuclear war, to win a nuclear war and that's very different. 116

And that's why I'm here to testify about the environmental impact that this weapons system would have if it were put here in Wyoming. Now, in the DEIS they talk about that the chains of an inadvertent programmed loss would be less than one in ten trillion, and I ask the citizens of the city how did they get that number, one in ten trillion. 164

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Who counted those numbers. We have to look very carefully at figures that are given like this to us. I'll say that I wonder what the figure was for the accidental explosion of a Titan II missile.

The only major accident we've had with a missile. But a Titan II missile exploded in its silo in Damascus, Arkansas, in December, 1980. What did they say the likelihood of that happening was? 164

How do we rectify what they said it was with what had actually happened? Killing one worker accidentally and injuring over 20 others.

In the statement they talked about threatened and endangered species and they worry as I do about the ferret, the trout, the Colorado Butterfly plant, the Wooly Milkvetch, and I, too, worry about that.

But my worry for those animals is to me as a physician the equivalent of the worry of a cancer patient of mine who's concerned because the cancer patient's neighbor has a case of the flu. The endangered species that I worry about is human beings. 50

Now, the other animal on the official list is the bald eagle, and that bald eagle as a representative of our country is symbolic and I believe our country is in danger the same way the

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bald eagle is admittedly at danger from the deployment of the missile system here. 50

We have a major adversary in the world and I don't downplay that at all. The major adversary is the Soviet Union. I believe by and large we created that adversary and they created us an adversary.

I'm here to talk national security, peace and freedom which is uppermost in all our minds and when we worry about the impact on the environment I wonder does it make our environment safer? Do we sleep better at night knowing we made the Soviets more nervous by installing the most powerful nuclear weapon power system in the world right here in Cheyenne?

Now, I live downwind from Cheyenne so it's not just the theoretical "We're on the spaceship earth" that concerns me, but it's very real that I and my wife and two teenage daughters, if a nuclear war were limited merely to an attack on the missile base here and the MX missile will make this the most attractive target in the world. 37

I will die in Chicago from fallout from that attack here because an attack on missile silos will mean multiple ground bursts.

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You will die right away, I will die a few days later from the fallout.

As a physician I always try to weigh the benefits and risks and I know that our Congressmen debated this, many scientists debated this. We are told we need the weapon system because the current weapons are vulnerable and all we're doing is putting a more attractive target into the same basing mode as the currently vulnerable missiles are.

It doesn't make any sense to me. I can't explain it to my kids and think about it for yourself. If you can't explain it to your kids it's probably because it isn't true, it doesn't make sense, it doesn't jibe with everything you know to be true. I would like to close since my time is up with a question to the audience. 37

The audience includes everyone in the room, the panel, be they in the room, it's a question that's posed by Bertrum Russell and it's not just the United States, it's the Soviet Union too, we're all in this together.

As a physician I take care of anyone that comes to me, whatever their problem is and I see the problem as being on both sides of this. The question is: What do they think about societies

that bury their missiles in the ground like treasure and shelter them that way and expose their children to nuclear incineration? 37

Thank you.

COLONEL SMITH: Our next speaker is Mary M. Purdy who is president of the Cheyenne High Plains Audubon Society. Is Miss Purdy here, please?

Apparently not.

The next card I have is that of Sarah Gorin Jones, a staff member of the Wyoming Nuclear Weapons Freeze Campaign.

Miss Jones.

315 MS. JONES: Good evening. I'm Sarah Gorin Jones representing the Wyoming Nuclear Weapons Freeze Coalition. This afternoon the Reverend Dr. Sally Palmer testified on behalf of the Freeze Coalition and pointed out three major deficiencies of the DEIS: its failure to analyze alternatives. 76

The failure to discuss the effect and its failure to discuss the new threat the MX as a first strike weapon will pose to residents of this area. 37 122

Specifically, that the Soviets may feel they use their weapons against the MX or lose them. In short we're talking about the threat of nuclear war.

I would like to address three questions to the panel which I would like to have answered this evening. The first one is, isn't it true that the MX with its ten warheads and greater accuracy and destructive power is more an available target than the Minuteman? 122

Secondly, isn't there a possibility that deployment of the MX and vulnerable silos will trigger rather than deter nuclear war?

And third, why weren't these questions analyzed in the DEIS along with the issue that logically follows it, the affects of nuclear war? 37

I am aware that the DEIS states the affects of nuclear war are speculative. I don't believe that's so and I would like to have the panel answer the question of why they weren't included in the draft impact statement.

CAPTAIN McMULLIN: Thank you for your questions. The first one we regarded is by deploying the MX missile in existing Minuteman silos, does that make it a more valuable target. The answer to that question is it depends how you define valuable.

My response to that is that there are over 30 states in this country that have nuclear weapons

in them or strategic forces that are used in combination of our Triadic strategic forces to fulfill our deterren strategy, which is the existing United States strategy -- that is, of deterrents.

The second issue that you asked, or the question you asked was regarding the vulnerability issue of our silos. While it is recognized that our land base ISBMs, which are becoming increasingly vulnerable, it is not felt that that is a significant -- dominant or significant -- or dominant enough part of the program to warrant further attention at this time.

The more critical issues that were discussed and reviewed by the Scowcroft commission was to address the aging problem of our existing systems. Titan is a good example of that. That accident that had occurred with the Titan system perhaps could have been prevented or never have happened -- had we chose or elected to dismantle the system earlier. That we have done to this date.

The other reason, besides the aging issue, is the counter-decreasing counter-capability of our existing systems and what that means is -- as a result of the Soviet Union sinking vast resources into upgrading their high value assets. Our

existing land base systems, our most accurate strategic Triadic forces are ineffective against the high value as sets.

Therefore, if we can hold as hostages the high value assets it increases the risk of a nuclear war. The purpose of deploying that missile is to reduce that risk and it will deter the Soviet Union from initiating a first strike.

The last issue or question that you asked was regarding the effects, the nuclear effects and why that was not addressed. That's a difficult question to answer, admittedly. As we defined it and you identify that, precisely how we defined it in the DEIS, let me amplify on that definition.

First of all, it's extremely difficult to quantify and to qualitatively evaluate the effects of nuclear war because of the various scenarios that can be used in a war-time conflict, anywhere ranging from a limited conflict or conventional conflict on out to, up to an all out nuclear attack.

Secondly, and I've already mentioned this regarding the impacts on this particular area, I would submit to you that it would take an assessment or an evaluation of those 30 states, which I mentioned previously that have nuclear weapons in

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them to evaluate the impacts of a nuclear attack, because we could consider those, as I'm sure the Soviet Union does, as primary targets from a targeting planner standpoint.

And lastly, let me reiterate the importance of the policy of the United States, and that is one of deterrents. The primary purpose for the deployment of 100 Peacekeeper Missiles in existing Minuteman silos is to deter the Soviet Union from initiating an attack against the United States or any of its allies.

COLONEL SMITH: Thank you.

Our next statement is from Sylvia Warsaw, a citizen of Cheyenne.

405 MS. WARSAW: Thank you for the opportunity to speak.

I do not have a prepared statement but I did study the three volumes that were submitted to public inspection and took a few notes on them which I would like to make some comments on.

Specifically, before I do that I would like to note a lot of people are great in quality. I know that there are a lot of people who aren't here because of an equally vital concern to the community and the nation and that is the chemical people, the

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drug problem, and many, many people are over at -- I imagine at Carey Junior High -- participating in that public forum.

The report that we were able to review was very similar and I appreciated the index so that I could find the area of interest to me in quite a short time rather than what I had gone through the whole three volumes.

One of the areas of interest to me was concerning the toxic and hazardous wastes. It was a very short segment and just about discounted that problem and I submit that the MX is the greatest hazardous waste of all time in terms of money and in terms of waste of humankind, if it should ever blow up. 173 104

I read with interest about law enforcement and the need for increasing that. I looked at the statistics on the baseline description and how it should be, what would need to be increased there in order to serve the population that will expand as a result of this MX project. 528

We get down to human services and although I'm speaking as a citizen I have been a social worker with Laramie County Department of Public Assistance and Social Services for the past nine 582

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years.

First, I noted that the Air Force really said it all in the statement about Warren Air Force Base Human Services and that is that there's an unmet need. And it was stated in page 3-203 section 3.4.4.1.3 on that need, that mental health services for dependant children and spouses, counseling and followup for abused or neglected children and their families, long-term therapy, bio-feadback therapy, service for developmentally disabled, specialized alcohol services, domestic violence shelter services, vocational rehab and family planning were all unmet needs. And it was stated in the following -- the section following that I believe it was the projected baseline, section -- at present there are difficulties in both case load and service provision to military dependents in the area of human services. 582

Should base population increase in the future the situation will be exacerbated unless more service staff are provided and the community service agencies increase their resources to deal with additional military dependents.

Then on the other hand, the statement went on to the human services in the community and they went from youth alternatives to all the different 677

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agencies in the community which are either private or public.

And in addition to that, they listed 14 total agencies serving center services. That's my bailiwick. I don't ordinarily deal with child abuse and children's services except on an emergency basis occasionally.

But they mentioned that there were too many social workers right now in Laramie County D-PASS and I seriously question this because they mention, I believe, that there were 15 social workers and I haven't been able to count 15 social workers in our agency for a long time. 677

I believe we have 10 -- no. I believe we have 11 or 12 social workers, two of them are half time, they share a case load. The others are supervisors or administrators, they're not social workers, they don't carry case loads.

There was management of the average case load being 20 persons in a case load, 20 clients nationwide being an average or something like that and here we have something like 45. I don't know where they got their figures because I have 160 and I'm not alone in having well over 100.

But that's a personal issue. I believe

that the baseline is way underestimated and these things have been stated by others more eloquently than myself concerning human services.

But I think you need to take a hard look at your data, your statistics, your projections for increased population for the people coming in looking for jobs; with it looking for health services, looking for some place to get their money, their food, their health services, all these things because they're going to be here, they're already here.

But they're going to be here in very great numbers and I think that this committee that I heard about, heard from earlier, the idea of getting the money base to support these things because the Wyoming legislators are not doing it at present and I think we need to make them, help them become aware that we have great human service needs in this community right now and they're going to be tremendously augmented.

And I think I'm getting a little too long winded and I thank you for your tolerance and your time here.

COLONEL SMITH: Thank you very much, ma'am.

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The next speaker that we have is Grant D. Parker, member of the Powder River Basin Resource Council, I believe it is.

288 MR. PARKER: That's correct. Good evening, my name is Grant Parker, I'm with the Powder River Resource Council. I'm going to comment on the merits of the MX missile system, just the DEIS, particularly to agricultural.

Many of the problems with regard to the statement have been and will be addressed tonight. Consequently, I will limit my comments to those rural areas that will see the direct deployment of the missiles. First and foremost, there is inadequate consideration in the DEIS of impacts to agriculture.

Traffic, dust, noise, decreased water availability and general disruption to livestock, farming and the agricultural operations need specific mitigation measures covered by the EIS.

The impact of missile deployment and property rights is of major concern. Cable routes, road expansions, possible power line alterations and the large non-habitation zone around the silos will impact the lives of many land owners in Wyoming and Nebraska.

There are a lot of Minuteman III silos in

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this region. One question I have for you is why didn't the Air Force consider the alternative of missile deployment in different silos in order to reduce impacts on the land owners in the environment.

There are nine homes in the enlarged safety zones in the silos. Why couldn't other silos be chosen instead of uprooting these homes and families. I have additional comments to which I would like you to respond.

First, if a landowner does not agree to sell an easement for a cable route or road enlargement or move a house in an enlarged zone, do you intend to use eminent domain and take his property? If so, do you plan to abide by state eminent domain laws.

Finally, will you offer compensation for the total damage and destruction of a ranching operation or farming operation if you need private property for missile deployment?

I would appreciate your answers to these questions concerning the Air Force's use of condemnation powers. Thank you very much for the opportunity to comment.

COLONEL SMITH: Thank you, sir.

CAPTAIN McMULLIN: Your first question

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regarding did the Air Force or why doesn't the Air Force consider deploying the missile in other silos so that the nine home owners would not be affected.

Technically, we have a problem with that. The reason is in order to preserve what we call squadron integrity or the -- interconnectively -- electronic interconnective of our existing silos to offer us a redundant command and control communication network it's imperative those missiles are grouped by squadron.

That contains 50 missiles. We plan to interconnect two squadrons, each containing 50 missiles so that we have a redundant operational command and control capability of 100 missiles supported by ten launch control centers.

If we were to move those around it would force us to move them outside of those two squadrons and it would be more difficult and more costly to interconnect those silos. We would have to uproot more ground to lay that cable and potentially affect more land owners.

The question about the existing safety zone around the landowners and how that, what the options are that we provided to them and how we will exercise those options, maybe I can review those

with you.

First of all, it's important to understand that we have in existence a restrictive easement or safety zone to the tune of 1200 feet around the current Minuteman silo. For planning purposes we are looking at increasing that safety zone by 550 feet.

That will be validated through a testing program that will be concluded in the spring of 1984. We may not have to change that existing safety zone. It could stay the same, it could increase or it could even reduce it.

If we do have to increase the safety zone to 1750 feet then we would have to discuss with the land owners and we have done this or at least informed them in advance and we have permanently contacted each one of them and followed up on several occasions with them to answer any questions they may have.

But we have informed them of three possible solutions which certainly are not exhaustive and we have offered a listening ear to any alternative they may have. One of those is of course, to place them in different silos or relocating the silos.

The options that we have considered and

certainly there may be others are threefold.

One is to, they could sell their farm, house or ranchhouse and associated farm improvements to the Air Force. Two, they could sell their existing house, just their inhabited structure to the Air Force and use the proceeds to buy a new house or build a new house outside of the safety zone or restrictive easement.

Within that option they could ask the Air Force to relocate that existing facility outside the safety zone. The third option is one of exemption whereby they should seek exemption from the safety rules so that they could not be disrupted and live right within the safety zones, acknowledging that we are aware of the risk, although very remote likelihood of an accident occurring. We have a safe record with the Minuteman as has been explained here tonight, the same type of fuels that are used in the Minuteman will be used in the MX missile, although those fuels have been refined and improved and are much more safe and reliable.

But nevertheless, they agree to stay within the safety zone, recognizing that risk and acknowledging it, but that exemption is not an exemption of liability on the part of the Air Force.

In other words, if an accident did occur we would be liable for replacement of any property damage that occurred to that farmhouse or their associated structures.

In terms of compensation in any of the forms but the two options that I outlined. We would offer them compensation for relocation under the Relocatic Assistance Act and we would, of course, have to enter into negotiations with them as to what they elected to do.

So there are several variables to those options, but nevertheless, they will be compensated to address your question.

COLONEL SMITH: Our next speaker is David Meyer. He is listed as an environmental scientist speaking on behalf of himself as an individual.

Good evening, sir.

384 MR. MEYER: Thank you, Colonel Smith. My name is Dave Meyer and I'm a resident of Fort Collins, Colorado. The nature of my business is reclamation planning and national resource inventory and I'm reviewing plans for environmental land use regulations.

I've been involved in the environmental

consulting business since 1978, and consider myself knowledgeable enough in the process of environmental impact statement preparation to make fairly valid judgments and raise legitimate concerns relating to the completeness of the document before us this evening.

But as time is limited tonight, to delve deeply into some of my concerns I will attempt to summarize my observations towards this document and prepare a more detailed synopsis of my findings to be submitted to the Department of the Air Force by November 28th of this year.

This, however, should not precluded you from addressing my concerns this evening as this is part of the hearings format. I would appreciate clarification of some of my assumptions this evening and perhaps Dr. Kramer can provide answers to my concerns upon completion of my statement.

The first observation is the DEIS adequacy 1102 Part C, Part 2 of NEPA which requires that impact statements include comment on the environmental efforts of this action. Under two Court decisions, in 1971, of the Committee for Nuclear Responsibility versus Seaboard; in the Environmental Defense Board versus the Corps of the Army, that they not. The

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statement must also include scientific opinion which disagrees with the agency's environmental predictions.

The intent behind the requirement of conflicting evidence is clear, that the party who drafts the statement is not to covertly influence the decision by deleting evidence which is not supportive of the agency's position.

This requirement pertains to economic as well as environmental concerns and my concern here basically backs up the councilman's concern before, that the draft EIS basically supports the positive aspects of the development of the MX as opposed to the negative aspects. 75

As the Air Force and its various contractors have indeed presented comments in the draft portion of the document, I would like to remind them and remind the public at large of the Air Force's obligation to account for dissenting opinions presented tonight and future communications presented before the document deadline and present those in the final EIS.

The matters of public policy aside I would now like to address certain concerns involving possible adverse affects to the biological resources within the region of influence and the area of 1419

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concentrated study. My main concern deals with the potential impacts which are stated in the text to be high, significant and long-term to the Colorado Butterfly Plant, category one plant proposed for endangered status.

Although technically this plant is not officially listed it is under consideration for this THE status, because it does qualify under the status and under an agreement between Warren Air Force base and the Wildlife Service, protection is guaranteed, under listing of the plant. 1419

My concern arises over the intent of the Air Force to adequately protect the plant. The three basic access road alternatives as in section 3.2.2.4.5.1 on page 3-245 will all impact the butterfly plant on a short and long-term high and significant level.

Although mitigation measures mentioned close monitoring of construction activities and a management plan for particularly biologically sensitive areas, it is obvious critical habitat will suffer irreparable damage.

I suggest that the Wildlife Service propose a specific management plan with a kind of timeline for the protection of the plant and allow latitude

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for public review of the plant prior to any construction activity where this plant may exist.

I propose similar protection for the rare Wyoming Wooly Milkvetch located only within a few meters of a security fence at silo P-2. 1419

It is necessary, under the intent of the law and under the intent of many regulatory agencies which would oversee these laws, to protect and manage these species in such a way as to prevent permanent decimation of these species.

Two other concerns that I encountered involve; one, the protection of soil resources, and two, mitigation measures pertaining to the protection of biological resources.

On the item of soil resources, it is stated in source 3.3.3.4 on page 3-255, that disturbed areas will be revegetated with native species as soon as possible.

If I'm not mistaken certain state and federal land use regulations require a specific time be named for the protection of that resource. I would like to see a clarification made on this issue. 1458

And secondly, in regard to the language capitally referred to in the text, numerous references are made to assumed mitigation measures 91

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and planned mitigation measures. I would submit that before any construction can commence mitigation plans by law have to be approved by the proper regulatory authority and plans cannot merely be assumed. 91

Lastly, I would like to make some personal comments regarding the preparation of the document. The Air Force, the Department of Defense and the administration contend in this document that, "the affects of war are speculative and lie beyond the scope of Peacekeeper deployment."

It's my belief that deployment of this rather deadly and unestablized weapon system may be the catalyst for environmental catastrophe, although it's speculative will be realized to a degree we can't possibly conceive. 37

I submit that the risk placed before us in this document are far greater than we realize. Before we blindly dive deeper in the hole being dug for us, I pray we will not be burdened with the long-term high and significant impacts of nuclear war.

Thank you very much.

LIEUTENANT COLONEL WALSH: I will handle the first two questions you posed to the

panel. First of all, regarding the documentation of contradictory opinions to those expressed by the experts hired by the Air Force, you are most correct, sir, all such statements must be contained in the document.

As I expressed in my opening comments every comment received here at the public hearings or written comments must be addressed, must be responded to.

We will either alter the draft statement to accomodate those inputs or give a reason why we have not so adjusted the statement.

That will be provided as an appendix to the final environmental impact statement.

With regard to your second question concerning the Colorado Butterfly. We recognize that three options are presently under consideration to egress routes in the base do have high adverse impacts on that particular plant.

We are presently conducting an investigation to see what measures we can take which will mitigate that impact: looking at realigning the roads, redesigning bridges, culverts, et cetera, whatever is necessary to reduce the impact on that particular plant.

The outcome of that investigation, of course, will be provided as a mitigation measure in the final environmental impact statement.

With regard to your last questions, I turn the mike over to Dr. Kramer.

DR. KRAMER: Still addressing the Gara species on F. E. Warren, we also are starting to develop a management plan. One will be developed in consultation with the Fish and Wildlife, as well as the Air Force and our own exertise for a long term management mitigation on the base.

No such plan has yet been contemplated but we will consider it for the Wooly Milkvetch. But that you have to consider, too, for the State of Wyoming it is rare because of its existence here on the edge of its range, which is important to any species.

But it is not a rare plant throughout the countryside, in the whole of the plains portion of the Western U. S. But we will take this into consideration and further consultation with the state as to how to treat it.

Soils and resources. As we've said exposed lands will be revegetated, ideally with native species. Ideally with seed stock from the top soil

as set aside and redistributed as part of that. And from that point of view its need relative to the national recovery of a system.

And in fact, that is one of the more successful methods used that is and does require the least amount of maintenance to, shall we say, to return a system to its original or near original condition. We have not specified a more specific timeframe than that.

We do not specify the exact construction scenario and its timing, so without that we couldn't possible say and give you a timeframe on when you're going to revegetate.

The last question I believe is relative to assumed versus planned mitigations.

MR. MEYER: Basically the terminology in there.

DR. KRAMER: Did you disagree or did you not understand the differences between the two?

MR. MEYER: Well, I've always been taught never to assume anything. That mitigation plans to my knowledge had to be conceived and set up in some sort of plan and approved by whatever regulatory authority may oversee that construction before the construction itself can begin.

DR. KRAMER: This is true and we have not disregarded that. The difference as we have used the two, are agreed to up front and they are taken into consideration in defining and identifying the level of impact that will result, assuming that this will happen, this is results that are left over, in a manner of speaking.

Planned mitigations would be those additional ones potentially used as appropriate, and as further defined a mitigation plan which we propose and which will be accomplished not as an intregal part of the FEIS but as a continuing document ahead of construction, yes.

MR. MEYER: Thank you for that clarification.

COLONEL SMITH: Our next speaker is Carol Ann Simpson, a student, I believe it's here in Cheyenne. Carol Ann Simpson.

Apparently no longer present. The next speaker is Brian D. Olson, a news director of KYCU, I believe it is, TV here in Cheyenne. He's speaking as a private citizen here tonight.

387 MR. OLSON: It's nice to see and know that adversity of opinion is alive and well here in America. I support the deployment of the MX missile

here in Cheyenne as I believe the majority of the people do. I don't think that's a blank check endorsement. 103

I was very impressed with the work done by the impact committees, done by the Chamber and also appointed by the Mayor to make some very good points. I've learned a lot tonight about the plantlife of Wyoming and that is a legitimate concern to many people, I know.

My main interest and concern is the people, people raising families such as myself. Specifically, I think the inflation problems that could arise from this, cost of housing people on fixed incomes, people coming into the job market, people coming home wanting to achieve the American dream of buying their own place.

I envision severe problems with that. I would hope the Air Force would develop a program working with local lending institutions, local 426 government agencies to provide a safety net, a safety net fund for these people that are going to be affected.

It would be a shame for the elderly people of the community living on fixed incomes, making this community what it is to affect it adversely, as

well as it would be the resource of the young people who are the future of our community to be adversely affected also.

I would hate to see them tossed out for a 426 relatively short-term project. I would encourage the Air Force to develop, and we're not talking $70,000 or $100,000, we're talking tens of thousands of dollars, and that that issue be addressed.

I compliment many of the speakers tonight who have come prepared with detailed information. I want maybe to speak in one generality. This morning my little girl made an extraordinary mess of her bedroom and it took her two and a half hours to clean it up.

The Air Force I think will come in and I'm not saying they're going to destroy the town but it 37 will be an extraordinarily major upheaval in the Cheyenne community during the next few years and I hope that when it's over you can restore things as much as you can back to normal.

That's about all I have to say. I respect everybody's opinions tonight and I thank them for listening to mine. Thank you.

COLONEL SMITH: The next speaker is Julian L. Hadley, secretary treasurer of the Nuclear

Club at the University of Wyoming.

279 MR. HADLEY: Thank you. One reason that's given in the DEIS for not including the effects of nuclear attack is that any assessment of these effects is speculative.

It's true that this assessment must in fact be based on probabilities, but this is also true for other environmental changes which are included in the EIS.

In spite of the uncertainties and several U. S. studies since 1975, the effects of nuclear war had attempted to estimate the effects of a nuclear 37 attack on the United States.

In the last three days a conference of leading United States scientists, for example, Dr. Carl Sagan met in Washington D.C. having even further predicted some of the effects of a global war.

Their predictions include near complete darkness in the entire northern hemisphere of up to a month due to the amount of dust and smoke created and temperatures falling to minus 50 degrees centigrade during that period.

An attack on MX missiles alone can and should be estimated in the environmental impact

statement. Regardless, however, of the exact affects of the nuclear attack I think we can agree that a greater significant adverse impact than all the impacts that are discussed in the EIS.

Therefore, as I have said before at the scoping hearings, the DEIS should at least deal with the affects of the MX deployment on the probability of this effort of the references to the Scowcroft Commission report did not do this adequately.

I submit there is some tenancy for paranoia which was expressed with the Korean aircraft incident, and will probably increase the likelihood 37 of their missiles being had. The environmental impact statement should exam these affects, it appeared there are psychologists qualified to do this.

I would also like to point out the draft environmental impact statement completely fails to deal with another concern which was raised at the scoping hearings. This is the effect of a possible nuclear accident on wildlife, which is on page D-5 of the DEIS.

Since the availability to enjoy wildlife for the people in the State of Wyoming this is a concern second to the failures of the DEIS to

address the effects of nuclear war on human beings.

This brings out my final concern which was expressed by State Representative William Edwards, this is a concern MX deployment will cost significant emigration instead of immigration from this area.

It is apparent from the scoping hearing a lot of people believe this will bring an attack from the Air Force. The Air Force has not determined how many people there are and how many will in fact move elsewhere, because of their fear such a disruption in the lives of these people as well as their neighbors, employers and their employees and others would be a significant adverse impact which would be addressed in the environmental impact statement.

Thank you.

COLONEL SMITH: Thank you very much, sir. The next speaker that we have is Marla Painter speaking on behalf of Western Solidarity.

307 MS. PAINTER: I'm representing Western Solidarity, an eight state organization. We consider this to be not only a problem for Cheyenne but for the western region, and in fact the world.

But I work all over the western region. I live in Warbo Valley, Nevada and I'm representing a lot of people tonight with different beliefs, most of them not similar to those the people in Cheyenne hold.

And I'm a veteran of the Nevada-Utah struggle against the MX. I have lived with the MX four years now and I know the monster well. And I wish to represent the many people outside of Cheyenne who would be strongly affected by deployment of this missile and many of whom have shown on lot of interest in reading the EIS which I can't believe, but a lot of people in Nevada have called me up and said -- and Utah -- and said, "Where can we get ahold of the EIS for the MX in Wyoming?"

One of my first concerns about the DEIS is with the public participation. Most of us who are not on official commissions or government officials have not had much of an opportunity to assess the adequacy of the DEIS because most of us received it, at the most, about six days ago and we were told we could not be sent the technical documents.

Now, it was suggested to most everybody -- and I had six reports of this that they go to their state library. Of course, we all know that the state library is a journey of 500 miles to western Nebraskans.

I realize since then we've been told most of the local libraries have the document, but in fact we were not told that when we called Norton Air Force base. Despite the graciousness I think of Lieutenant Major Walsh, this is a reality and it's someone I think has inherited public participation.

I think another reason that public participation has been inhibited is not only the lateness of the hour but because this is relatively the beginning of the comment period, not the end -- which seems to me to be the logical time to have public hearings -- to have people stand up and give their impressions and their analysis of the adequacy of the DEIS.

So it's very hard to expect a lay person, a lay citizen, to assess this huge document in less than a week or two. So I would like to make that first as a concern of mine about the public participation involvement.

Now, the other thing is I would like to commend the Air Force actually for incorporating two legal realities that I have heard tonight. The first is that the EIS is a document with which to decide whether or not to deploy the MX, not a document to justify a decision which has already been made.

I heard that made by the members of the panel and I'm glad to hear they believe that. And also that they intend to comply with the regulations governing NEPA. Without utilizing any potential exemptions from that law, however, I do have problems with the DEIS as a representative of eight western states I would like to go over briefly.

The heart of the EIS, the alternative section and this DEIS is heartless. What would occur if the MX is not deployed? That's not discussed at all.

What would the economic, political and strategic consequence be? What would the long-term economic impact be on the local area, on Cheyenne or on eastern Wyoming or on the whole west if that available money were released in the economy for private enterprise or economic development.

That's a very important question, particularly in light of the testimony we've heard tonight about the sad conditions of the economy in this area and I can certainly talk about other areas of the west where this is true.

We also need to understand the impact of an action alternative to understand the full impacts of

deployment, of potential deployment and as we all know any opinion is only as good as the validity of the background from which it's drawn.

There is no background, no perspective within which to put the findings of the DEIS. Having been in the MX discussion for a number of years I'm amazed that the very reasons for supporting past deployment modes are now extinct and suddenly Secretary Weinberger and the Air Force are justifying this basing mode with the same arguments they used to dismiss the same silo basing one year ago. 78

For this reason there must be a critical discussion in the EIS, regarding deployment modes even though I know the Jackson Amendment supposedly exempts the Air Force and I think to make this a fair EIS that has to be discussed.

For one moment let's dismiss the possibility of an anti-ballistic missile system protecting these silos or even super hardening, and let's assume we're going to leave the MX in Minuteman silos a vulnerable basing mode, a sitting duck. Explain to me how it is you're going spend $30 billion of our funds to act as a nuclear sponge, to have these missiles a nuclear sponge as a 122

concentrated Soviet first strike.

If the president, if this is being done to give the president a little more time to decide what to do in such an unthinkable event, then why are the people of this region expendable rather than the people in New York or in Washington D.C. or in Los Angeles?

Why are the people of the west also the targets, always the expendable ones?

Now, you'll say well, 30 states have nuclear weapons, the MX isn't more vulnerable than Minuteman. But the fact is they are, because they're much more dangerous. 122

They're a very different kind of weapon. They're 1,000 warheads tied up in 100 targets, they're the scariest, the fastest and most accurate and powerful weapon we've ever built to threaten the Soviets.

If we receive an alert we will release ours before confirmation but there isn't enough time. Now, let's assume that --

COLONEL SMITH: Could we bring it to a winddown.

MS. PAINTER: I'm almost done, thank you. If this is the case we have to analyze whether

we're actually seducing the Soviet attack during times of international crisis and I hope the people of Cheyenne think about that just as people all over this country have to think about the MX as a seduction for nuclear weapons in the Soviet Union when times are tense between us. 122

Now, I understand about the deterrent argument and I want to point out people need to read more about Trident II and Minutemen. How many times do we have to kill a dead dog? We know we can destroy Soviet military and civilian targets many times over.

Now, when an EIS is done in building a dam or power plant project the document covers the use of that project. Yet on this project the most destructive project to the future of mankind, we're told to cover the impact of using this weapon is speculative. 37

It's been said many times tonight, and I want to reiterate that's not true, there are many government studies which talk specifically about the effects of nuclear attack and they should be applied to this region.

I would also like to see the EIS address the adjacent issues assuming that we are going to 35

protect these silos and not make them sitting ducks of ABM, super hardening and even Minuteman because it is part of the package. 35

You keep referring to the Scowcroft Commission and you have to think then to the entire package not just the MX. Thank you.

COLONEL SMITH: Thank you, ma'am.

LIEUTENANT COLONEL WALSH: I would like to respond to just a select few of the comments that you've made because many of the latter comments we did address previously in the briefing.

The first one, I would like to ensure that everyone understand that the DEIS and the supporting ETPR or environmental technical planning reports are available on request and if you want to look at any of them you just have to contact or write a letter, write a card to the address that is shown on the handout that was given to you as you entered tonight.

In fact, we have made a considerable distribution already of both documents in addition to the additional distribution.

I should further point out that we have made every attempt to get these documents and make them available to the communities at the earliest possible time -- at the initiation of the public

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comment period. The document was in fact filed with the EPA on the 7th of October and we had a press release at the time.

We had a press release in the Federal Register on the 14th of October and announcing the availability of the document. Prior to the notice the Air Force had express mailed to most libraries in the area and to county and city clerks in the area copies of the complete set of the documents.

We further sent the documents to as many people as we knew had expressed interest in the project. Now, to those people we sent copies of the DEIS.

With respect to the time available for you to review the documents prior to the public hearing, as I indicated earlier if you did not have time to read it completely prior to this particular hearing you may send your written comments to the address shown in the handout. Your written comments will be given equal consideration to any verbal comments given here tonight.

And one last comment, the document does in fact consider the no action alternative of remaining with the Minuteman III missiles.

Thank you.

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COLONEL SMITH: The next speaker that we have is Joseph Stern, an attorney from Fort Collins, Colorado, speaking on behalf of himself.

398 MR. STERN: One of the people from the Chamber of Commerce said that he thought it was unfortunate that the ten year project was compressed to a three year term and I would suggest that many people would like to see that period extended to 20 years in order to alleviate his problem. 152

Most of those people who favor the MX keep wanting money and in view of the fact that Congress has recently refused to up the debt limit from the excessive one trillion it now is, I think we should be concerned with the kinds of monies that is being sought in this area and try to reduce that kind of expenditures. 117

One of the problems that we have also is that people may want to come to this area in order to seek employment and then they may stay on and cause problems with crime and drug addiction and alcoholism. 552

I think what we should do is insist they put up a bond when they come here and they would be forfeited if they stay on beyond the term of the project.

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There has been a lot of talk about the Colorado Butterfly Plant. I'm glad to see there is some concern about Colorado in that regard. I do come from Colorado and we have asked for hearings to be held in Colorado.

I think I heard in the opening remarks that there were hearings held as far away as Kansas City, Missouri, and Lincoln, Nebraska. I would think you would consider holding these hearings in Colorado, which is in the impact area as well. 22

As far as these other plants that are endangered such as the Wooly Milkvetch, I do think that people are far more important and I think the doctor who was here and testified earlier can point out that children have a very strong aversion to nuclear war and are fearful they might not grow up. 1419

And if we are talking about environmental impact I think the impact on the children is of paramount importance and that is what has not been addressed in the impact statement and I think it should have been, this kind of fear, the psychological fear that is affecting all people, especially children. 40

Not only is that taking place but the monies that are being contemplated being spent for 117

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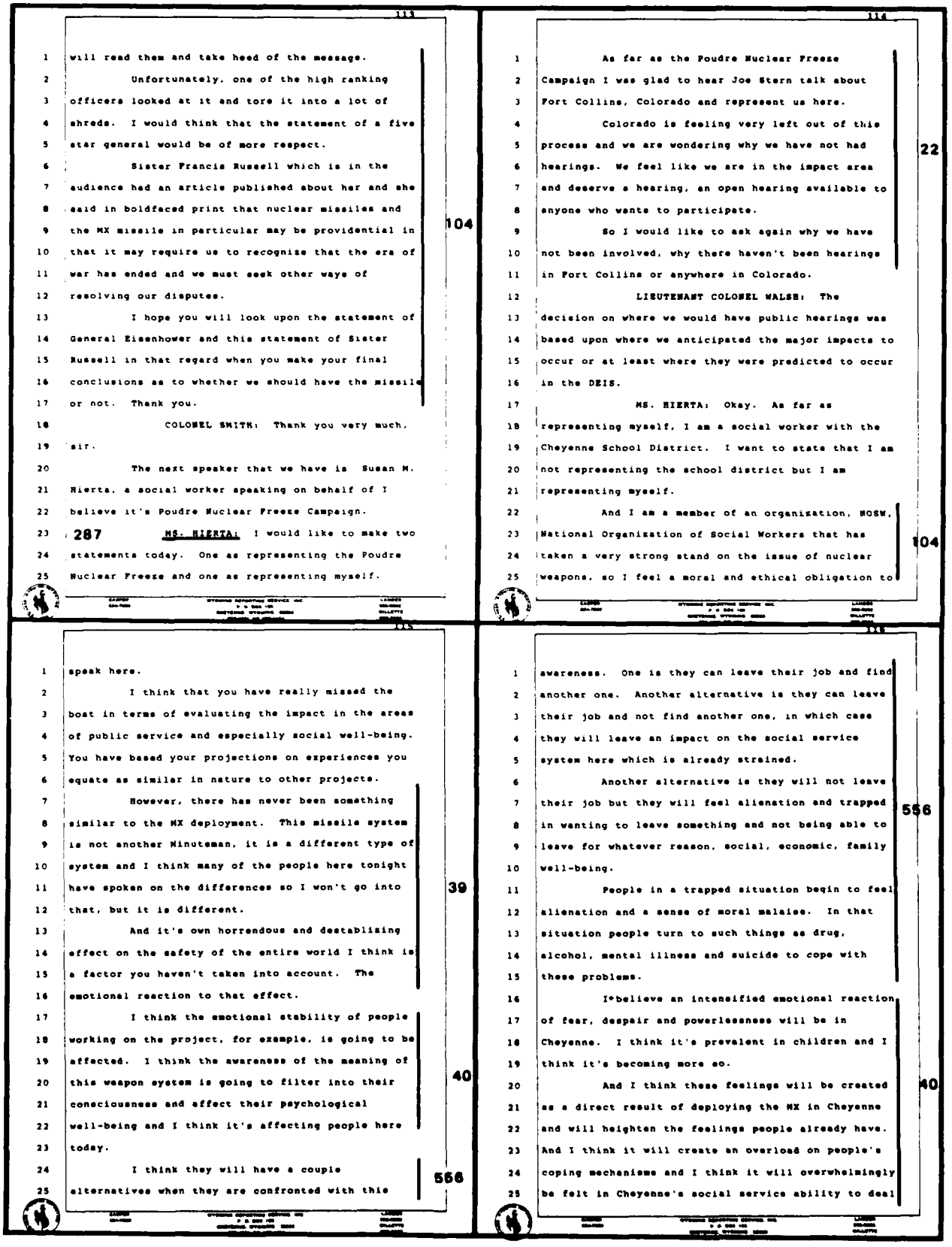
this system is destroying the lives of people now by denying them the kinds of benefits they might have received if it weren't for the exorbitant amounts of money being spent on the military including the MX system. 117

I am grateful for having the opportunity to speak and also for the other people having the opportunity to speak. I am reminded of King Frederick the Great said on the principles of free speech. Namely, my people and I have an agreement, they say whatever they want and I do whatever I want.

I passed out some handouts relating to a statement by President Dwight D. Eisenhower and you all know he was a five star general as well.

He said as follows: "When we get to the point as we one day will, when both sides know that in any outbreak of general hostilities regardless of the element of surprise, destruction will be both reciprocal and complete, possibly we will have sense enough to meet at the conference table with the understanding that the era of omnipotence has ended and the human race must conform its action to this truth or die." 104

I am grateful that most of the officers I approach accepted what I handed to them and I hope



will read them and take heed of the message.

Unfortunately, one of the high ranking officers looked at it and tore it into a lot of shreds. I would think that the statement of a five star general would be of more respect.

Sister Francis Russell which is in the audience had an article published about her and she said in boldfaced print that nuclear missiles and the MX missile in particular may be providential in that it may require us to recognize that the era of war has ended and we must seek other ways of resolving our disputes.

I hope you will look upon the statement of General Eisenhower and this statement of Sister Russell in that regard when you make your final conclusions as to whether we should have the missile or not. Thank you.

COLONEL SMITH: Thank you very much, sir.

The next speaker that we have is Susan M. Hierta, a social worker speaking on behalf of I believe it's Poudre Nuclear Freeze Campaign.

287 MS. HIERTA: I would like to make two statements today. One as representing the Poudre Nuclear Freeze and one as representing myself.

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As far as the Poudre Nuclear Freeze Campaign I was glad to hear Joe Stern talk about Fort Collins, Colorado and represent us here.

Colorado is feeling very left out of this process and we are wondering why we have not had hearings. We feel like we are in the impact area and deserve a hearing, an open hearing available to anyone who wants to participate.

So I would like to ask again why we have not been involved, why there haven't been hearings in Fort Collins or anywhere in Colorado.

LIEUTENANT COLONEL WALSH: The decision on where we would have public hearings was based upon where we anticipated the major impacts to occur or at least where they were predicted to occur in the DEIS.

MS. HIERTA: Okay. As far as representing myself, I am a social worker with the Cheyenne School District. I want to state that I am not representing the school district but I am representing myself.

And I am a member of an organization, NOSW, National Organization of Social Workers that has taken a very strong stand on the issue of nuclear weapons, so I feel a moral and ethical obligation to

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speak here.

I think that you have really missed the boat in terms of evaluating the impact in the areas of public service and especially social well-being. You have based your projections on experiences you equate as similar in nature to other projects.

However, there has never been something similar to the MX deployment. This missile system is not another Minuteman, it is a different type of system and I think many of the people here tonight have spoken on the differences so I won't go into that, but it is different.

And it's own horrendous and destablizing effect on the safety of the entire world I think is a factor you haven't taken into account. The emotional reaction to that effect.

I think the emotional stability of people working on the project, for example, is going to be affected. I think the awareness of the meaning of this weapon system is going to filter into their consciousness and affect their psychological well-being and I think it's affecting people here today.

I think they will have a couple alternatives when they are confronted with this

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awareness. One is they can leave their job and find another one. Another alternative is they can leave their job and not find another one, in which case they will leave an impact on the social service system here which is already strained.

Another alternative is they will not leave their job but they will feel alienation and trapped in wanting to leave something and not being able to leave for whatever reason, social, economic, family well-being.

People in a trapped situation begin to feel alienation and a sense of moral malaise. In that situation people turn to such things as drug, alcohol, mental illness and suicide to cope with these problems.

I believe an intensified emotional reaction of fear, despair and powerlessness will be in Cheyenne. I think it's prevalent in children and I think it's becoming more so.

And I think these feelings will be created as a direct result of deploying the MX in Cheyenne and will heighten the feelings people already have. And I think it will create an overload on people's coping mechanisms and I think it will overwhelmingly be felt in Cheyenne's social service ability to deal

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with this.

I think some of the people before me have spoken on the concern that the DEIS has not adequately addressed the projected impact on service needs. The DEIS has addressed this problem in terms of numbers.

We add more money here, more services here, more people, more band aids to cover problems that already exist, more band aids to deal with problems that will be created by the MX.

You have talked about what would you do in response to problems created. But I don't think that the sponsors of the MX have talked about how they are prepared to prevent one more social problem, one more child who would wake up in the middle of the night with night terrors not being able to function as a result of this.

One more person, young person who feels a sense of hopelessness about the future and commit suicide, that happens and I want to know and this is a question, what you are prepared to do to prevent one more traumatic event, not what you're going to deal with after it happens but prevent one more.

COLONEL SMITH: Does the panel have a response?

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MR. HICKMAN: Within our evaluation of social well-being in the broader sense and human services, specifically we have seen that there are existing needs and there would continue to be existing needs as the population of both the city and Laramie County grow.

We recognize that those needs, the human problems that are behind them will be exacerbated to some extent by the Peacekeeper Project. But to project them and as has been pointed out tonight to simply say that they are coming and to provide mitigation after they have occurred is not the solution.

We have looked at measures with various agencies of not only monitoring any changes that might take place but putting into place various programs, educational programs for one that might begin to perhaps, to any extent possible, lessen the fear through more knowledge, better understanding of what is occurring and preventative actions that as they can and as they would be administered through local programs would begin to alleviate some these problems, so that they would not later simply require band aids as you put it.

So we would see that there are various

approachs and have suggested mitigations that can be preventative measures.

MS. HIERTA: I appreciate the opportunity to speak tonight.

COLONEL SMITH: Thank you ma'am. I note the time is right at 11:00. We'll try and take one more statement, though. That of Robert M. Lawrence, professor at Colorado State University, Department of Political Science.

371 MR. LAWRENCE: Colonel Smith, I appreciate the opportunity to address comments to the federal government twice within two days. I too am a Coloradoan. The state boundary is 12 miles south of where we sit this evening here in Cheyenne.

As a Coloradoan I can't speak for Governor Richard Lamm of my state nor the city council, my home town of Fort Collins, Colorado, but I know as well as you gentlemen do that repeatedly the public officials in my state have requested the Air Force to hold hearings in Colorado to explain the basic impact to the MX Missile System not only upon Colorado and the West, but upon the entire United States.

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I share the concern of my fellow Coloradoans tonight. I don't understand why the Air Force

refuses to come and participate in open hearings in the State of Colorado. My second point, I would like to direct the Governor's attention to a curious imbalance which exists between your MX DEIS document and two other Government documents which are relevant to the questions before us tonight.

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Your DEIS contains 593 pages. In my opinion it's rather well done, it's exhaustive in its analytical values. You consider the Colorado Butterfly Plant, you considered dust on roads, you consider the sewer system in Cheyenne, the numerous other areas. You hardly leave any stones unturned.

What bothers me is the following comparison. You ought to look at this document which weighs several pounds and compare it to the 26 pages of the Scowcroft report which is the entire analysis of the fullblown thing; strategic posture from now until the year 2,000.

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You ought to compare your enormous document and exhaustive document to the 11 pages of Dr. Schrader's report recently issued in regard to the Companion Missile, the small ICBM. It seems to me that the Air Force is on kind of the wrong footing as is the Department of Defense.

You almost seem to be diverting the public

attention to the exhaustive and relatively well done work you have accomplished here regarding fairly insignificant environmental impacts.

It seems to me the government of the United States should address the fundamental impact of the MX deployment and the small ICBM and that is the continued integrity of the national security of 245 million persons. Thank you, Colonel.

COLONEL SMITH: Thank you very much, sir. We still have quite a few cards here. It simply is not practical to continue on.

We're at the scheduled time of completion. We thank you very much for your participation in this proceeding and certainly appreciate your comments and statements that you presented here tonight.

Once again, I remind you written statements may be left at the registration desk in the lobby and may be forwarded to the address in the handout that you have that shortly will be on the screen.

Does the panel have any final comments or words?

(No response.)

COLONEL SMITH: Apparently not.

Ladies and gentlemen, we thank you very much once again and good evening.

(Hearing Proceedings concluded 11:05 p.m., November 2, 1983.)

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CERTIFICATE

I, CYNTHIA C. BUNTEN a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 121 pages constitute a full, true and correct transcript.

Dated this 3rd day of November, 1983.

CYNTHIA C. BUNTEN

DEPARTMENT OF THE AIR FORCE

PEACEKEEPER IN MINUTEMAN SILOS

ENVIRONMENTAL IMPACT STATEMENT PROCESS

PUBLIC HEARING

TRANSCRIPT OF HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties in interest, this matter came on regularly for hearing on the 3rd day of November, 1983, at the hour of 3:00 p.m., in the 4-H Building of the Platte County Fair Grounds, Wheatland, Wyoming. Colonel Allen Smith presiding.

Also present were Lieutenant Colonel Peter Walsh, Colonel Warren Hickman, Lieutenant Colonel Rees Padfield, Major Dave Taggart, Captain Mike McMullin, Mr. Fred Hickman, and Dr. Richard Kramer.

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PROCEEDINGS

(Public hearing proceedings commenced 3:00 p.m., November 3, 1983.)

COLONEL SMITH: Ladies and gentlemen, if we could take seats. We'll get started here in just a moment.

Good afternoon and welcome to this, the fourth of seven scheduled hearings in Wyoming and Nebraska on the draft Environmental Impact Statement for the Peacekeeper in Minuteman silos Program. I'm Colonel Allen Smith, an Air Force Trial Judge.

And I've been appointed Hearing Officer of these series of hearings. My role is simply to conduct the hearing.

I have not been involved in the development of the Peacekeeper Project, and I will not be making any recommendations or decisions concerning it.

First on the agenda this afternoon, there will be an explanation of the Peacekeeper Project and the draft statement by Lieutenant Colonel Peter Walsh, your briefing team chief. Following his presentation statements, comments from local governmental officials will then be accepted.

We will then have a short break. After the break,

statements, comments and questions from representatives of organizations and individuals will be received. Questions will be answered by our team of experts and specialists.

This hearing is scheduled to conclude at 6:00 p.m. To provide the greatest opportunity for all of those who wish to present comments or questions, we ask that you fill out one of the cards available in the lobby. Now, speakers will be recognized from the floor only if time permits and after all of those registering to speak have had the opportunity to do so.

If time does not permit you the opportunity to speak this afternoon, you certainly may submit written comments or statements. This may be done by presenting such statements at the registration desk in the lobby or by mailing them to the address on the hearing handout that you have.

That address will be on the screen at a later time and at various times throughout the afternoon. We have a court reporter here this afternoon and a verbatim transcript of the entire hearing will be made.

We also have a videotape team, and a videotape of the proceedings will be made as a backup to the transcript to insure that the record is complete and accurate.

Captain Pat Mullaney is in the rear of the hall.

If there is any special requests of the press or questions, please refer them to him.

We are now ready for the briefing on the Peacekeeper Project and draft statement by Lieutenant Colonel Peter Walsh. Colonel Walsh,

STATEMENT

BY LIEUTENANT COLONEL PETER WALSH:

Good afternoon (slide 1.)

I am Lieutenant Colonel Peter Walsh, Director of the Environmental Planning Division for the Air Force Regional Civil Engineer at Norton Air Force Base. In this position, I am responsible for the preparation of the Environmental Impact Statement for the Peacekeeper in Minuteman Silos Project. Today I intend to summarize the major findings of the draft Environmental Impact Statement issued on October 14 for the project.

However, before reviewing the findings, I shall provide the background and context for the statement. Specifically, I shall cover the following subjects (slide 2:)

First, I shall review events leading to the Presidential decision to deploy the Peacekeeper in Minuteman silos. Second, I shall briefly describe the project. Third, I shall discuss the scope of the Environmental Impact Statement. Next, I shall describe the process

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and methods used in preparation of the statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final Environmental Impact Statement.

The same briefing will be presented at all public hearings so everyone will receive the same information.

PRESIDENTIAL DECISION (slide 3)

In accordance with the Presidential decision of April 19, 1983, the Air Force plans to deploy the Peacekeeper Missile System within the 90th Strategic Missile Wing at F. E. Warren Air Force Base near Cheyenne, Wyoming. In making this decision, the President was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the President on January 3, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

PROJECT DESCRIPTION (slide 4)

The project described by the President entails: 1) replacement of 100 of the existing Minuteman III missiles with 100 Peacekeeper missiles in the 400th and 319th Strategic Missile Squadrons located near Cheyenne.

In order to implement this decision, the following actions are required: 1) modification of existing facilities and construction of new facilities at F. E. Warren Air Force Base; 2) modification of 100 missile

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launch and ten launch control facilities in the aforementioned squadrons; 3) installation of five additional buried cable systems connecting the two squadrons; and 4) upgrading the existing deployment area road network.

The project will commence in early 1984, soon after the final Environmental Impact Statement is filed. Initial operational capability, defined as the first ten operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989.

Operations of the Peacekeeper will be similar to the Minuteman system. The major differences are in the transport and emplacement of the missile. The Minuteman stages are transported fully assembled and emplaced in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle, and emplaced in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman system.

Similarly, the Peacekeeper system will be as safe, if not safer, than the Minuteman system. An accidental burning or detonating of a Minuteman has never occurred during any of its past 19 years of deployment. The Peacekeeper system has benefitted from this field experience as well as improvements in technology.

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Development and use of insensitive high explosives in the Peacekeeper reentry system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command. The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than one in ten trillion.

SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT (slide 5)

Given the Presidential decision and its implementation requirements, the Air Force prepared the draft Environmental Impact Statement in accordance with the Council on Environmental Quality Regulations. The statement assesses the impacts of the deployment and peacetime operation of the system, alternative project elements, and the no-action alternative of retaining the existing Minuteman III missiles.

This statement does not cover the analyses of alternative basing modes, nor deployment locations for the Peacekeeper missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the "Jackson Amendment," exempted such analyses from the requirements of the National Environmental Policy Act.

Likewise, analyses of other basing modes such

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as super hardening of protective structures, deep basing, and ballistic missile defense are not included in this statement. They are excluded because first, they were not part of the President's decision; second, the Air Force does not intend to propose any of them in the reasonably foreseeable future; and third, Peacekeeper deployment is not connected to any of these potential systems.

Furthermore, the environmental impacts of nuclear attack are not analyzed in the statement because the effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operation.

PROCESS AND METHODS (slide 6)

Following the President's decision and subsequent approval by Congress, a Notice of Intent to conduct the Environmental Impact Statement process and the schedule for scoping meetings was published in the Federal Register on June 13, 1983.

The scoping meetings were held between June 27 and July 8, 1983. Public meetings were held in Cheyenne, Pine Bluffs, Torrington, and Wheatland, Wyoming; and Kimball and Harrisburg, Nebraska. Additional meetings were held with federal agencies in Denver, Colorado, and Kansas City, Missouri, and with Nebraska state agencies in Lincoln, Nebraska.

The purpose of these meetings was to obtain information for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental resource in a two-step process. Study areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project.

Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analyzed within both the regions of influence and the areas of concentrated study. Four

categories formed the framework for impact analysis. They are area, timing, intensity, and significance (slide 7.)

Area is defined as either site, local, or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site. And, region is the previously discussed region of influence for each resource.

Timing is defined as either short term or long term. Short term is the period from commencement of work (i.e., early 1984) until the system is fully operational (i.e., late 1989.) Long term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission.

Intensity is defined as negligible, low, moderate, or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during project planning or requires extensive action to mitigate.

Upon completion of the analysis, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages. A set of 13

environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the document was published in the Federal Register on October 14. On that date, the document was also available at librarires and federal, state, and local agencies within the study area.

FINDINGS OF DRAFT ENVIRONMENTAL IMPACT STATEMENT (slide 8)

In this review, I shall present a description of each resource studied. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing, and intensity of adverse impacts. Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rationale for such judgment will be given.

You may follow my presentation on the table inside the handout made available as you entered the auditorium.

EMPLOYMENT DEMAND I

Employment demand describes the available regional labor force which may be used by the project, and the demand for non-local labor which may result in the immigration of workers and their families.

The analysis indicates a short and long-term, beneficial effect on the City of Cheyenne and the region of incluence because of increases in employment and income.

During the peak employment years 1986 and 1987, approximately 3,300 persons will be employed as a result of the project. There will be about 1,800 direct and 1,500 indirect jobs. Approximately 1,000 of the 3,300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements would be filled through either immigration or weekly commuting.

When the system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

HOUSING I

Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demand.

Local, short and long-term beneficial effects result from potential increases in sales value and rental income due to increased housing demand in the Cheyenne urban area and the City of Kimball. There is, however, an opposite effect on the consumer, particularly those on fixed income and first-time home buyers.

The analysis indicates a local, short-term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the City of Kimball exceeds the projected net vacancy rate. Also the market response would have to exceed the highest historical

annual production level. The analysis further indicates local, long-term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as outmigration occurs during 1986-1990.

The local, short-term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

PUBLIC FINANCE

Public finance describes the budgets, fiscal resources, and obligations of all major governmental entities, including school districts and urban service areas.

The analysis indicates a local, short and long-term, beneficial effect because of additional revenue to governmental entites due to increased sales and property taxes, and other taxes and fees.

The analysis further indicates local, short-term, moderate impacts because many local governmental entites would face potential budget imbalances. This would require either an increase in revenues or a reduction in service-related expenditures during peak project activity. The analysis also indicates local, long-term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

CONSTRUCTION RESOURCES I

Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, structural steel, reinforcing steel, and steel rail.

The analysis indicates that regional, short-term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analysis further indicates a regional, short-term, low impact resulting from the project's increased demand on regional production capacities of cement, aggregate, ballast, asphalt and roofing.

SOCIAL WELL-BEING I

Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions, and selected indicators of behavior.

A local, short-term beneficial effect is anticipated due to the improved economy.

The analysis indicates local, short-term, moderate impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with the inmigration of population.

The analysis further indicates that the local,

short-term impacts were judged significant because the population subgroups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job-seekers, adolescents, and fixed-income elderly.

PUBLIC SERVICES AND FACILITIES I

Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety, and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal justice, fire protection, health care, human services, and libraries.

The analysis indicates local, short-term, moderate impacts. These impacts are due to a 7 percent increase over what is projected for the student population without the project in Laramie County School District Number One in the peak year, 1987. Also contributing to the impacts is the need for additional firefighters, vehicles, and space for the City of Cheyenne Fire Department; the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne; and increased demands in health care and human services.

The analysis further indicates local, long-term, moderate impacts are a result of the continued need for additional staffing and classroom space in Laramie County

School District Number One. These impacts are also the result of the need for additional law enforcement in the City of Cheyenne.

The local, short-term impacts were judged significant because of overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control, and the potential for human service needs that are unsatisfied.

UTILITIES I

Utilities describes water treatment and distribution systems, wastewater systems, solid waste systems, stormwater facilities, and telephone service.

The analysis indicates that site, short-term, low impacts are a result of a further overloading of an existing sewer downstream of the F. E. Warren Air Force Base sewer and the need for additional on-base telephone equipment. Local, short-term, low impacts result from the further degration of the performance of existing waste-water systems in the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and stormwater facilities in the Cheyenne urban area as a result of new land development in the region.

The local, short-term impacts were judged significant because the overloaded operating condition of

the wastewater systems in the Cheyenne urban area and in Torrington will be aggravated.

ENERGY RESOURCES I

Energy resources include the supply and distribution systems for electrical power, natural gas, petroleum fuel, and coal.

The analysis indicates local, short-term, moderate impacts as a result of the need to expand the capacity of a local electrical substation serving F. E. Warren Air Force Base by about 40 percent. Local, long-term, low impacts result from increased energy demands. The analysis also indicates regional, short-term, low impacts as a result of the depletion of nonrenewable energy resources from the construction phase of the project. Regional, long-term, low impacts are a result of the depletion of nonrenewable energy resources by Peacekeeper operating personnel.

TRANSPORTATION I

Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design, and operation of roads, railroads, aviation facilities, public transit, and pedestrian and bicycle facilities.

A long-term, beneficial effect is anticipated due to the improvements to roads and bridges at the site.

local, and regional levels.

The analysis indicates site, short-term, low impacts as a result of construction activities on and near roads in the deployment area. Local, short-term, moderate impacts are indicated as a result of reductions in the level of service at 13 of 26 impacted intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F. E. Warren Air Force Base Randall Avenue Gate due to the influx of construction workers and materials onto the base. The analysis further indicates regional, short-term, low impacts as a result of existing capacity constraints and increased demand at Cheyenne Airport.

The site, short-term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternate travel routes. Local, short-term, moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area, and construction delays may impact Randall Avenue at the Interstate 25 interchange.

LAND USE I

Land use comprises both urban land uses in developed communities where population immigration is

expected and rural land uses in the deployment area where direct impacts from project development would occur.

A local, long-term beneficial effect may occur from the infill of vacant areas within the city boundaries of Cheyenne and Kimball.

The analysis indicates site, short-term, low impacts are a result of the temporary interruption of agricultural land use during cable trenching. The site, long-term, low impacts are a result of restrictions on residential land use within explosive safety zones. The analysis also indicates local, short-term, low impacts are a result of the underutilization of land developed to support mobile homes beginning in 1987 as outmigration begins. Local, long-term, low impacts are a result of the continuing underutilization of land developed to support mobile homes.

RECREATION I

Recreation includes regional, resource-based, recreation which is related to federal, state, and other lands offering rural outdoor recreation opportunities and local, user-based, recreation which is related to municipal and county-owned parks and facilities within urbanized areas.

The analysis indicates local, short-term, moderate impacts as a result of increased demand for parkland,

facilities, and staffing. The analysis also indicates local, long-term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation system, requiring additional expenditures for operating and maintenance.

The analysis further indicates regional, short-term, moderate impacts primarily as a result of increased demand at Medicine Bow National Forest and Curt Gowdy, Glendo, and Guernsey State Parks. These regional impacts become low in the long term due to reduction in the number of users when outmigration occurs.

Local, short-term, moderate impacts were judged significant because of the need to seek funding outside of the normal budgetary process in order to provide additional local parkland and recreational facilities. Regional, short-term, moderate impacts were judged significant because the additional use of regional recreation facilities will exacerbate an existing overcrowded situation thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

CULTURAL RESOURCES I

Cultural resources include four separate elements: Paleontological, prehistoric, historic, and American Indian cultural resources.

The analysis indicates site, short-term, moderate

impacts as a result of ground-disturbing activities associated with Peacekeeper deployment that may affect historic and prehistoric sites. The analysis also indicates site, long-term, low impacts as a result of the use of buildings at F. E. Warren Air Force Base currently listed on the National Register of Historic Places.

VISUAL RESOURCES I

Visual resources include scenic resources and the visual environment, as well as an evaluation of the visual quality of the region.

The analysis indicates site, short-term, low impacts due to clearing of vegetation and grading activities during construction.

WATER RESOURCES I

Water resources includes groundwater hydrology and quality, surface water hydrology and quality, water use and demand, and constraints on water use.

The analysis indicates site, short-term, low impacts at F. E. Warren Air Force Base, launch facilities, and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology. Site, long-term, low impacts are a result of permanent changes to stormwater runoff characteristics. The analysis also indicates local, short-term, moderate impacts because induced water demand exceeds the projected

capacity of the existing delivery system for the Cheyenne urban area.

Local, long-term, low impacts are predicted because of increased water demands, increased surface runoff, and increased erosion and sedimentation in the Cheyenne urban area. Regional, short-term, low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development.

The local, short-term, moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

BIOLOGICAL RESOURCES I

Biological resources include vegetation, wildlife, fisheries, and unique and sensitive habitats.

The analysis indicates site, short-term, moderate impacts as a result of the potential immediate disruption, by construction or modification activities, of riparian vegetation and wildlife habitats. The analysis also indicates site, long-term, moderate impacts as a result of construction activities that may potentially disrupt trees and shrubs in riparian and wetland habitats that have long recovery periods. The analysis further indicates that there are regional, short-term, moderate impacts. These are the result of general recreational pressures,

poaching, dog kills, and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park. Regional, long-term, low impacts are a result of the random shooting of the swainson's hawk and other birds of prey.

The site, short-term, moderate impacts were judged significant because of the limited extent of riparian and wetland habitats. The site, long-term, moderate impacts were judged significant because of the long recovery periods of the riparian vegetation.

Regional, short-term, moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased human activity on big game in areas of concentrated recreation pressures. Regional, long-term, low impacts were judged significant because of concerns over declining populations of some species of birds of prey.

THREATENED AND ENDANGERED SPECIES I

Threatened and endangered species include plants, wildlife, and aquatic species which are protected by federal law as threatened or endangered. Also included in this category are state-protected rare, threatened, or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because of special state concern.

The analysis indicates site, short-term, high impacts as a result of the disturbance of the habitat of the Colorado butterfly plant and the woolly milkvetch. Site, high impacts will continue in the long-term as a result of the loss of habitat for the Colorado butterfly plant. The analysis further indicates regional, short-term, low impacts as a result of the potential for random shooting of the bald eagle and accidental catching of the greenback cutthroat trout. Regional, long-term, low impacts are a result of the continuing potential for random shootings of the bald eagle.

All of these impacts were judged significant because the bald eagle and greenback cutthroat trout are federally-listed endangered species; also, the Colorado butterfly plant is categorized as a Category One species by U. S. Fish and Wildlife Service, and the woolly milkvetch is listed as rare by the Wyoming Natural Heritage Program.

GEOLOGIC RESOURCES I

Geologic resources include geological hazards, energy and mineral resources including aggregate, and soil resources.

The analysis indicates site, short-term, low impacts as a result of the potential for soil erosion during construction activities. The analysis further

indicates local, short-term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading. The analysis also indicates local, long-term, low impacts resulting from the need for aggregate resources for road maintenance.

NOISE I

Noise analysis includes vehicular, air, and railroad transportation, and construction activity.

The analysis indicates that the impacts will be negligible.

AIR QUALITY I

Air quality describes the effects of project construction, operation, and related transportation activities upon future air quality.

The analysis indicates local, short-term, low impacts. These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a result of construction activities.

ALTERNATIVES (slide 9)

As previously discussed, project alternatives were analyzed. These analyses focused on alternative road configurations, cable routes, and staging areas. The

analyses have demonstrated that for most of the resources areas, the level of impact is either negligible or low and not significant, and does not vary within each of the three sets of project element alternatives. For four resources areas, transportation, land use, cultural resources, and biological resources, there are variations in the level of impact among alternatives. I shall summarize these (slide 10:)

As shown on this slide, three alternative egress routes for transporting the Peacekeeper stages from the base were considered. Alternative R-2, which is the proposed action, is designed to allow all northbound stage transporter travel to exit the base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road bridge clearance problems, and the egress of the stage transporter at the Central Avenue interchange and at the Missile Drive interchange to travel north or south.

Alternative R-3 involves providing stage transporter access to Interstate 80 via Round Top Road which would require new on/off ramps at Interstate 80. Access to the north would still be via Interstate 25 near

the Central Avenue interchange (slide 11.)

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads offbase, in addition to new on/off ramps at Interstate 80. This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Round Top Road may tend to stimulate urban development west of F. E. Warren Air Force Base would would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transporter route has the potential for intersecting cultural properties eligible for the National Register of Historic Places. In addition, all three alternatives have a high and significant impact on the habitat of the Colorado butterfly plant because of potential disturbance during the construction phase of the project. This impact was judged significant because of U. S. Fish and Wildlife Service's Category One classification of the plant species (slide 12.)

For the project five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons

will be installed. A total of ten alternative cable corridors have been identified for environmental analyses.

Three alternatives (PA1, SB1, SB2) follow overland routes. Two of these follow easements previously obtained by the Air Force for communications cables. One alternative (PA2) follows an existing road right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way (slide 13.)

Impacts among the alternative cable paths did not vary appreciably with the exception of land use, cultural resources, and biological resources. The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to the documented presence of archaeological sites in the area which the cable will traverse and the high probability that these routes would destroy additional, presently unrecorded sites. The remaining four routes have been assigned a low or moderate impact, based on the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing

critical habitats. These impacts were judged significant because of the limited areas of these habitats (slide 14.)

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center.

The proposed action would have staging areas located on the base, and in Cheyenne, Wyoming, and Kimball, Nebraska. An alternative would have temporary support areas only on the base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed (slide 15.)

Impacts among the locations considered did not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the proposed action, which includes a staging area in Kimball, because of the potential of congestion on community roads. Similarly, impacts on cultural resources would be low for the proposals that include staging areas on the base because of the presence of prehistoric and historic cultural resources.

CONCLUSION I

In conclusion, the draft Environmental Impact Statement projects beneficial effects in employment demand, housing, public finance, construction resources,

social well-being, transportation, and land use. It further predicts, that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transportation, recreation, water resources, biological resources, and threatened and endangered species.

MITIGATION I

To the extent practicable, standard practices that could avoid, reduce, or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures which could be used to reduce impacts have been identified. These include requesting funds through existing federal impact aid to school districts for Laramie County School District Number One, the Department of Defense and Wyoming and Nebraska government entities have agreed to enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense which will mitigate adverse impacts resulting from the project.

FUTURE ACTIVITIES I

(Slide 16) The statements, comments, and questions provided during the public hearings and written comments postmarked by November 28, 1983, will be analyzed. After the close of the comment period, the Air

Force will review and evaluate all inputs to determine how they should be responded to and the need for revisions to the analysis contained in the draft statement. The completion of this work will result in the development of the final Environmental Impact Statement to be released by January 31, 1984 (slide 17.)

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this afternoon. This completes the briefing portion of the hearing. I shall now turn the program back to Colonel Smith.

COLONEL SMITH: Thank you very much, sir. Let's go ahead and take about a ten-minute break at this point. We'll come back and have statements, comments, questions from anyone who desires to present them.

So let's break for about ten minutes.

(Hearing proceedings recessed 3:54 p.m., and reconvened 4:08 p.m., November 3, 1983.)

COLONEL SMITH: Ladies and gentlemen, we'll proceed on with the hearing at this point. First I'd like to introduce to you the team members that will assist Lieutenant Colonel Walsh in responding to questions

and comments that you have this afternoon.

First we have Colonel Warren Hickman, who is the Site Activation Task Force Commander at F. E. Warren Air Force Base. Next we have Lieutenant Colonel Rees Padfield, who is the Assistant Chief of the Requirements and Integration Division of the Ballistic Missile Office at Norton Air Force Base, Colorado.

And we have Major David Taggart, who is the Staff Judge Advocate of the Air Force Regional Civil Engineer at Norton Air Force Base, Colorado. We have Captain Mike McMullin, who is the Air Force Headquarters Peacekeeper Liason Officer in Cheyenne, Wyoming.

Mr. Fred Nickman, who is the Human Resources Director for URS-Berger, San Bernardino, California. Finally Dr. Dick Kramer, who is the Natural Resources Director for URS-Berger, San Bernardino, California.

That is the team of specialist personnel that we have here this afternoon to respond to the questions. We're ready for you to proceed with comments, questions from members of the audience. We do ask that you make an effort to limit your comments to approximately five minutes.

The first card that I have is that of John W. Blevins of Guernsey, Wyoming, I believe it is.

Good afternoon, sir.

STATEMENT

BY MR. JOHN BLEVINS:

335 I have a Minuteman near my farm house, and the recent newspaper articles tell of the safety easement area being extended from the present 1200 feet to 1750 feet.

My measurements indicate that would bring it within about 50 feet of the farm house, farm buildings would be in the easement area.

The article stated that there were nine people whose homes were in this area; and the alternatives were to have the Air Force buy the home, and you could relocate and to get a variance to allow you to keep your house there. 186

Well, if you get a variance, I presume there must be some hazard or you wouldn't want the house moved in the first place. And there's quite a bit of family tradition connected with a farm house.

It's been there for 60 years, and I had a similar problem when the Minuteman was located there. They increased the easement area, and at that time I tried to get them to move the site.

They claimed it would cost them $10,000 to move it because of resurveying and core drilling. Now, it would probably cost 150 or 2,000 to move my farm buildings

to another location. And my suggestion is why can't you leave the Minuteman there and delete that one MX from your program? 186

Further, I notice that the Basin Electric Power Plant here is probably within the same distance or maybe closer than my house is. And are you going to have them move their power plant? There's a lot of people that are there 24 hours a day. Thank you. 187

CAPTAIN McMULLIN: I appreciate your comments, Mr. Blevins. I know you and I talked about this shortly prior to the beginning of the public hearing.

For the benefit of the audience, let me repeat. As I told you, the President's plan called for the deployment of 100 Peacekeeper missiles in existing Minuteman silos. The decision was made where to deploy those missiles and entails two squadrons that Colonel Walsh described at the beginning of the presentation.

Those two squadrons are electrically interconnected -- or we plan to electrically interconnect those two squadrons. To move the missiles elsewhere would be technically impractical.

Another proposed solution would be to relocate the silo. Unfortunately we have some political constraints on that. The Administration has agreed to do nothing that would undercut the existing arms control agreements.

All SALT II has a restriction -- the Strategic Arms Limitation Agreement has a constraint or restriction in it. This is Article IV, which states that each party or either side is prohibited from relocating a fixed ICBM silo launcher.

Therefore, since the Administration has taken the position not to undercut that agreement; therefore we cannot physically relocate that silo. So looking at those aspects, the technical aspects and the political aspects, we are limited in that. But we are exploring options regarding your questions concerning the power plant.

That's something we must have to look at and take consideration of before we can make a judgment on that. I might point out one thing as a point of clarification. Although we are planning to increase the safety zone by about 550 feet over the Minuteman safety zone, we have no plans to do that until we evaluate through a testing program that would be concluded in the spring of this year.

So we may not have to alter that existing restrictive easement. On the other hand, it could be extended, it could be somewhat less than the 1750 feet. And that's something we're just going to have to look at.

COLONEL SMITH: The next card that I have is that of Carol M. Schure, I believe it is, of Casper,

Wyoming, speaking on behalf of the Geologists and Hydrologists in the Casper area.

MS. SCHURE: May I speak a little later?

COLONEL SMITH: Surely.

The next card I have is that of Mark A. Koons of Wheatland, Wyoming.

STATEMENT

BY MR. KOONS:

370 I'm Mark Koons, and I'm the representative of Platte County Citizens for Peace to the Wyoming Nuclear Weapons Freeze Coalition, which is an organization comprised of nine local Wyoming groups advocating the biological verifiable freeze for the testing and function of and deployment of the nuclear weapons by both the Soviet Union and the United States.

Although our time to speak today is limited, we take this opportunity very seriously. As Americans we enjoy great privileges and great responsibilities. In few other countries do citizens have the chance to examine and comment about issues such as the proposed MX deployment.

This is the essence of democracy, and we are proud to be a part of it. The Air Force says we are to direct our comments to the subject areas outlined in the DEIS, not to the reasons for the proposed MX deployment or related issues of the technical areas, such as water

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resources and schools, which are important. And we will be supplying written comments on these topics, but today we wish to focus our comments on the overriding deficiencies of this document, of its failure to seriously analyze alternatives to the proposed action including the alternative of no deployment, its failure to describe the impact of MX deployment in vulnerable silos, on global nuclear stability, and its failure to consider the new threat that the deployment of this weapon will pose to Wyoming residents including the possibility of nuclear war.

The Air Force's idea of analyzing alternatives is to discuss different cable routes and modifications to the interstate highway. This is akin to discussing the arrangements of deck chairs on the Titanic. 76

The real issue facing us is does the United States need the MX deployed in Minuteman silos; and is this action truly the best our country could take? A mere two years ago our current Secretary of Defense, Caspar Weinberger told Congress that "putting the MX into existing silos would not answer two or three of the concerns that I have: Namely, that the location of these are well known and are not hardened sufficiently, nor could they be to be of sufficient strategic value to count as a strategic improvement of our forces."

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The circumstances Mr. Weinberger spoke of have not changed. The Air Force states in this DEIS that "neither superhardening of silos nor installation of a ballistic missile defense system to protect the MX will be done in the 'reasonably foreseeable future.'"

We can only conclude that either there are plans for these defenses and we're not being told about them now, but the associated resource demands would be significantly greater than for the current proposal; or that the deployment of the MX in Minuteman silos is essentially creating a vulnerable target.

For these reasons and many others, we believe the Air Force should thoroughly analyze the alternatives to the proposed action. We urge this because such analysis is at the heart of the Environmental Policy Act despite Air Force claims that Congress has exempted them from conducting such analyses. 76

This claim is of dubious legality and in any case does a grave disservice to the people of this region who are expected to live with this missile and have the right to know why. It's been said that Wyoming residents are used to living with missiles because of the Minuteman.

It's absolutely essential to realize that the MX is not just a fancy Minuteman. It's a fundamentally different weapon. With its ten warheads and greater

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accuracy and destructive power, the MX has the capability to destroy missile silos thereby putting the Soviets in the untenable position of using or losing their missiles.

On the other hand by deploying such a valuable target in a vulnerable silo, we will in the words of the late Senator Jackson, "Have given the Soviets a better target to shoot at."

We believe the DEIS should examine how the MX deployment will disturb the current nuclear balance between the two superpowers and create greater nuclear instability. Although the DEIS states that the MX is needed to deter nuclear war, it also states that the effects of the nuclear war are "speculative," and therefore will not be addressed. 39

The effects of nuclear war are far from speculative. They have been documented at Hiroshima and Nagasaki and in numerous tests conducted by the military, as well as scientifically projected from available information about the destructive power of nuclear weapons and the effects of radiation. 37

We suspect the real reason the Air Force ignored this issue is that they don't want to say that nearly everyone would be killed and the Wyoming that we know and love would be damaged beyond recognition.

Driving over to Laramie and Rawlins is called for

41

in the Laramie County Civil Defense Plan and would not make much difference. We cannot run away from nuclear war, so we have a right to be informed of the consequences.

Again, thank you for the opportunity to testify today.

COLONEL SMITH: Thank you very much, sir. Our next speaker is Mary A. B-u-s-c-a-j.

STATEMENT

BY MS. BUSCAJ:

339 Hello. No one knows how to pronounce my name, so that's okay.

I'm here in behalf of the Citizens for Peace of Platte County and also just a resident of Wheatland, Wyoming, myself. I was here last July and raised a question concerning the psychological effects of the nuclear arms race on children, and I do see that printed in the DEIS.[4] It does have it stated as the question was raised, "expected psychological profile of existing and future residents."

However, as I read through this statement, I still don't feel that the DEIS has addressed that question at all; and to me, that is an important part of an Environmental Impact Statement. 40

Senator Gary Hart while in Casper this past Tuesday said that the MX will be the highest priority targets

of the Soviet Union. This statement I can't ignore from our Senator from Colorado.

I must keep this in mind when I'm considering the children of this community, and I feel I know the children of this community, for I am with them six hours a day for I teach here in Wheatland. And one concern that I have is that I know that children require a sense of confidence that adults can provide them with, safety and comfort.

They must be reassured by adults that they are -- that adults are working hard together to end the threat of nuclear war. How can I assure the children in my classes in Wyoming that this in fact is being done while the MX is being placed in our existing Minuteman silos; and as it has been described, from three warheads to ten warheads? And that the Soviet Union looks more closely at Wyoming because of this. 40

I want to know in what ways are we encouraging everyone else to value the national worth of our health our social well being, which is a part of a statement within the document; but I don't see anything being addressed to it, and also to the ecology while our country is escalating the nuclear arms race once more by placing, as a paperhead stated the other day, "approval of 21 missiles in the existing Minuteman silos."

I thank you for letting me speak once again on the

same subject.

COLONEL SMITH: Thank you very much, ma'am.

LIEUTENANT COLONEL WALSH: With respect to your question on the psychological impacts of the deployment, I should refer you to a recent Supreme Court case in which -- between the Metropolitan Edison and PANE, or People Against Nuclear Energy.

In that ruling the Supreme Court stated that the National Environmental Policy Act addresses the physical environment and the protection of human welfare by insuring that decision makers are made aware of the effects of their actions on the physical environment.

Basically they said that an DEIS should address the effects of an action if there is a close causal relationship between the effect and change in the physical environment. With respect to persons' perception of fear of a nuclear accident, they said there was not a close causal relationship between that fear and the action; and therefore it was not suitable for inclusion in the Environmental Impact Statement.

Thank you.

COLONEL SMITH: The next card that I have is that of Evelyn Lifsey of Denver, Colorado. Good afternoon.

STATEMENT

BY MS. LIFSEY:

299 My name is Evelyn Lifsey, and I'm representing the Western Solidarity; and as I said in Cheyenne, I feel very strongly that the comment period should be extended. I think the people have raised a number of issues that have not been addressed in the DEIS. It's a solely unquestioned document and did not address a lot of issues that were supposed to be included. And I think that Colonel Walsh, with all due respect, your response to this question about psychological effects is rather "wishy-washy" of an answer, and another Supreme Court decision could well turn that around. 23

And rather than have the Air Force tongue-tied to find a way to keep addressing the problems that you've heard over and over again from these hearings, the URS-Berger should be looking into ways to address them and deal with it because it's a problem in many communities.

And educators and religious people have been speaking to this continually. I also would draw your attention again to the fact that the Scowcroft Commission, which has mandated the MX missile be placed in fixed-basing also included as a package deal that the President work towards arms control. And in 1983 we did have a technical report out about deploying single warhead missiles, which 35

is to be in peacetime on Department of Defense land in the West; and in wartime crises, in other basing modes as yet undetermined.

As that package deal, National Environmental Protection Act, calls for it to include all the aspects of a given project; and I think that with -- as part of the technological forecast, the DEIS should include the Minuteman. It's not just the MX, it's both. It's a series of weapons systems that are going to be impacting this area. 35

I think that's all. Thank you.

COLONEL SMITH: Thank you very much, ma'am.

CAPTAIN McMULLIN: Thanks, Evelyn. I'd like to just comment on a couple of things regarding the package deal that you stated. First of all the Administration, nor the Department of Defense has any current plans to deploy the small missile or to take advantage of any of the research, development, or technology programs that we are beginning to look at. Those things include superhardening, to look at the feasibility of superhardening missile silos. So it can be looked at in a variety of applications to include deep underground basing or hardening of mobile-type launchers.

Regarding the small missile report that you referred to known as the Sheafer (phonetic) Report, that

is a preliminary report for a planner in terms of him looking at what we are looking at in research development. It presents alternatives for him, but there is no decision or conclusion arrived at in that report as to how we should base that missile system.

Those are alternatives, some possibilities that we can look at which establish only criteria for us to proceed with the research and development or research and development program.

COLONEL SMITH: The next card that I have is that of Marla Painter, also representing Western Solidarity.

STATEMENT

BY MS. PAINTER:

305 I'm representing Western Solidarity, an eight-state coalition of Westerners concerned with the danger of deploying the MX missile. We consider this to be not only a problem from the tri-state area, but for the Western region.

I work all over the Western region and I am a veteran of the Nevada-Utah struggle. I've lived with the MX for about four years now, and I know the missile well. I wish to represent as many people outside the tri-state area who would be severely effected by deployment of this missile and who are not represented here today.

One of my first concerns is with public participation, as you know. Most of the non-governmental officials working as citizens on assessing this document received it only about six days ago, and we were told that we could not be sent the technical document.

This is changed today, and I want to compliment the Air Force because I called Norton Air Force Base today and asked for the technical documents. The people there were suddenly very polite, very accommodating, and very gracious; and they said they would go out immediately. And I appreciate that change in their attitude because I felt very stone-walled.

It's almost impossible to assess the document without taking a look at the data upon which the document was based, and I now will be able to do that. However, we felt we wanted to be prepared for this hearing. We wanted citizens to feel prepared for this hearing, and we weren't able to do that. In fact, we have a consultant who is going to interpret the adequacy of the document and then put it into the English language for regular citizens so they could participate in this hearing; but that didn't happen. **17**

And that didn't happen because we received the document six days ago. As well, I fail to see the logic of putting public hearings at the beginning of the comment **19**

period rather than towards the end of the comment period. It seems if you want public input, verbally, you would give people the most time you could possible to look at the document rather than -- I'm sure you're trying to accommodate your own schedule, and I don't think that that encourages public participation. **19**

Now, if I heard correctly last night in Cheyenne, I'd like to commend the Air Force for incorporating two of what I think are the most important legal realities in that process. One is that the Environmental Impact Statement is a document in which to decide whether or not to deploy 21 missiles funded this year and not a document to justify a decision which has already been made.

As we suggested at the scoping hearings, the President is not above the law. No one is above the law in this country, and the President has to abide by the law. And we also concur with the Wyoming Outdoor Council and others including our own attorney that the Jackson Amendment does not exempt the Air Force from preparing a "site-specific statement" on this proposed action.

Also that you are willing and have been willing to comply with the National Environmental Policy Act, to comply with the regulations therein. I think that that's commendable.

However, I do have serious problems with the

drafted Environmental Impact Statement, which as a representative of eight Western states, I'd like to go over.

At the heart of an EIS as most experts feel is the alternative section. This DEIS is rather heartless. We have to look at what -- no action as well as the alternative to each specific action within the proposed project. And the overall no-action alternative wasn't looked at very seriously.

It was talked about briefly, but not seriously. For instance, what would happen if there was -- if the alternative no action were decided upon, the MX was not deployed, what would happen to the long-term economic impact on this part of the country? **76**

Things -- for instance, if dollars were freed up in the country, 30, maybe $40 billion, how much of that would then be put back into private enterprise and economic development for the West?

We need to understand the impact of the no action alternative in order to understand the full impacts of the deployment. The opinion is only as good as the background from which it is drawn, and we are not given much background. We are just given the no action alternative from which a base from which everything else is discussed.

Having been in this MX discussion for awhile, I'm

also amazed that the very reason for supporting past deployment of that missile is different deployment modes are now extinct; and suddenly Secretary Weinberger and the Air Force are justifying this basing mode on the same criteria which it used to dismiss that rationale only a year or so ago.

For this reason, that must be a critical junction 76
in the EIS regarding a deployment mode; and even though that's not required by law, it's a necessary discussion to have with the public, and it's one that was never adequately held with the public.

For one moment I'd like to discuss the MX, dismissing the possibilities of an anti-ballistics missile system and superhardening, most of which would have a tremendous and profound impact on the environment in this region, and let's assume that we're going to leave the MX in Minuteman silos, unprotected.

I think that this is an overwhelmingly vulnerable basing mode, making the MX a "sitting duck." And I think everybody in this room realizes that, so in this case I think we're all owed an explanation as to why we're spending 122
$30 billion of our tax money to put this region up as a "nuclear sponge," a concentrated target for a Soviet first strike.

Even if it's in the rationale to buy the President

a few minutes in which to decide what to do in such a horrid event, why are the people in this region the ones that seem to be expendable? Why aren't the people in New York or D.C., or Los Angeles expendable?

Now, you'll say, 30 states have nuclear weapons, the MX isn't more vulnerable than the Minuteman; and most people don't understand that theoretically they are the scariest, most dangerous weapons that we've ever developed.

They are the fastest, the most accurate, and the strongest. And the scenario seems to me to be either you're setting people up here as "sitting ducks;" or you're 122
planning on using those missiles against empty targets in the Soviet Union. Unless you're planning on a first strike, which I'm assured again and again you aren't.

So I think people in the region deserve an explanation about the rationale for basing the MX here. Apart from this, I would also like to mention that all DEIS's that I've ever read is written about a project which is going to be used; and it's assumed that therefore you cover the impact of the use of a dam or a power project or whatever it is that's proposed. And so I therefore think that the people of this country are owed the -- an explanation on the impact of using this project as well.

And it's critical that we look at the impact of 37

using this weapon; and I know that you think it's speculative, but I can assure you it's not speculative. There are reports by the Office of Technological Assessment, there are reports by physicians, and most recently, just this last weekend, there was a conference which is going to produce a report by some of the most dignified and respected scientists internationally whose conclusions were in the words of Dr. Paul Erlich (phonetic) "robustly 37
consistent on this issue."

And we have the technological material and you have the expertise and ability to put together a scenario so we're not constantly so removed from what it is we're doing here.

Thank you very much.

COLONEL SMITH: Thank you, Ma'am.

LIEUTENANT COLONEL WALSH: I shall answer a few of your initial questions to be followed by Captain McMullin.

First of all, there has been no change in Air Force policy regarding the definition of the ETPR. As I pointed out to you last night, it is mandatory that we make such documents available to citizens upon request, and in fact we have done so and have distributed a significant number of these documents in addition to the DEIS to people who have requested them.

Furthermore, we filed this document on the 7th of October. On that date we made available press releases to the various communities affected so that people knew of the document.

We filed the Notice of Availability of the document on the 14th of October. Prior to that date, we had mailed to all the local libraries in the areas affected and to clubs in the cities and counties, copies of the document. So they were available on the first day of the 45-day current period to any citizen that wishes to review them.

Further, we had sent copies of the DEIS to every group and every person that had asked for -- had demonstrated an interest in the project, either through written communication to my office or by being present at the scoping meetings.

We understand some of you through failures of the postal system or through us not having your current address, did not receive documents precisely on that day. However, they were available through other resources.

We felt because it is a very large document representing a significant amount of scientific research, that it is difficult to get through it in a very short period of time. However, as I stated earlier in my briefing, your written comments which may come later after

these public hearings, would be given the same consideration as anything said this afternoon.

With respect to your statement concerning the purpose of the document, unfortunately we must have had a misunderstanding. The purpose of the document is not to lead to a decision or to help a person make a decision on the deployment. That decision has already been made by the President and approved by the Congress.

The purpose of this document is to identify the impacts of that decision so that proper mitigation procedures may be taken. Naturally, within the President's decision there are still some alternatives which we discussed.

Those decisions will be pending the final outcome of the Environmental Impact Statement and will be made with those assessments taken into account.

CAPTAIN McMULLIN: With that thought in mind, let's turn to the other side of it in terms of why weren't these other alternative basing modes looked at and what about the vulnerability issue.

While it is true that members of the current Administration, when they first came into office made some statements after a few committees had met together, one in particular, a "towns committee" and identified some alternatives to the MX basing or to the MX missile system.

And one of those alternative suggestions was to an interim deployment of 40 MX missiles in Minuteman silos.

The statement that you referred to by Mr. Weinberger was regarding that decision. Also, many members of the Congressional delegation made statements similar to that regarding the vulnerability issue. So it is true to some extent that there were statements made regarding that.

When the President charged and commissioned a specific group, a distinguished group from a variety of areas, scientific community, former defense experts, people from various industry and labor forces, a variety of areas. This bipartisan group met and was charged with the responsibility of reviewing our entire strategic forces and pay particular attention to our land-based missile systems.

In that review they identified several criteria, several weaknesses in our land-based systems. Two of those weaknesses of our land-based systems were the ranging of those systems and the decreasing counter military capacity.

That counter military capacity is as a result of the Soviet Union's sinking vast resources into updating or improving their high value assets, their command control leadership facilities, their strategic forces, primarily their land-based ICBM's.

In order to address those two problems, the Scowcroft Commission identified the MX or Peacekeeper missile as the solution to address that problem, the ranging of our forces and the counter military capacity problem. Since our current forces today -- and although we have modified them to a certain extent -- nevertheless, they are entirely too ineffective against those high-value assets, although they do provide us a great deal of deterrence and will continue to serve well for many years in a variety of applications in that deterrent role.

Nevertheless, it was felt in review of a variety of basing modes, as many as you can probably think of and as you indicated, you've been around for awhile, and some of the basing mode applications, it was their judgment based on the projected threat that we need to immediately deploy 100 Peacekeeper missiles in existing Minuteman silos.

The vulnerability issue, which was a concern of the Commission was not significant enough to warrant any further attention at this time. And they viewed that in terms of the entire strategic triad of forces or even when viewed in isolation.

Yes, there is a window of vulnerability; but not to the extent that people have suggested. Since there is a lot of uncertainty associated with a more survival basing

mode, it was the Commission's recommendation that we look to the long-range at what we can do to increase the servability of our land-based forces. But since there was no interim solution and since they decided to put one missile system in one type of basing mode to address all of the problems, it just became almost insoluble. So they came up with an approach.

The approach that was agreed upon by the President was the immediate deployment of 100 Peacekeeper missiles. We are addressing that -- as Lieutenant Colonel Walsh indicated, we are addressing the environmental impact associated with that deployment; but the decision has been made by the President, the Congress has approved that decision back in May; and now they are proceeding with the funding of that decision.

Just one last closing comment, and it's regarding the nuclear war issue. The primary purpose and the nuclear strategy of the United States, the policy of the United States is one of deterrence, to deter the Soviet Union or any would-be agressor from initiating a would-be attack on the United States or any of its allies.

COLONEL SMITH: The next card I have is that of Carol M. Schure.

MS. SCHURE: Thank you.

STATEMENT

BY MS. SCHURE:

254 I am Carol Schure from Casper, Wyoming. The last two days I met with geologists and hydrologists to confer over our concerns on that portion of the DEIS; and we feel that it is inadvisable to deploy it in this area because of the geological and water impact. I've left a copy of our concerns with Mark Koons, is it?

MR. KOONS: Yes.

MS. SCHURE: So the residents of this area -- so they could go over it if they would like to concerning a little more about what we're trying to say.

Basically we address three areas, and the first area is the water supply area. Your report summarizes that there will be adverse effects. 1323

Some of them are labeled "long-term," and some are labeled "short-term." Residents who depend on the ground water need to take a closer look at the extent of these effects. Due to the nature of recharging or rejuvenating ground water supplies, it's possible that short-term effects would become long-term effects.

And our report goes a little more into detail on that. Since I've left it for the residents to look at, and I've left a copy for you, I'd rather not go into the details of how that can happen right now.

We would also like to see a cone of depression map that shows where the water table will be at the different stages of development in this project. If that map was made available to local ranchers, they could then consult the map and determine if their wells would be effected by the change in ground water level. 1324

And also we want to know how you intend to obtain the water rights to the Crow Creek watershed, and we want to know if your statistics reflect drought conditions. 197 1341

Now, I have to find my place here.

Our next big concern from a geological standpoint is the possibility of leakage and contamination due to construction damage resulting from the geodynamics of this area of effort. There are no Geological Survey of Wyoming, County Resources Series developed yet for Laramie County, Albany, nor Platte, Goshen Counties. This series of maps shows the known seismic activity and fault locations to date, which may or may not be significant because measures done by Richter instrumental readings have only been available since the early 1900's. 1467

In our opinion, these are the only reliable recordings of quakes. The Modified Mercalli reports, which you used throughout this report, are subjective visual reports, and therefore we consider invalid.

Who can predict when a fault will be active or

not? In geological time, 60 years of Richter readings is hardly an indicator. The present Rockies were beginning their -- or began their formation in the Cenozoic period and are still rising and falling today. This is a very seismic area, and a new fault could develop at any time. There may be faults right now that we just haven't mapped yet. 1467

Another major concern refers to the page 2-118 of your report in which you describe -- this will start out, "The National Earthquake Information Service data showing the earthquake that was 65 miles west of Cheyenne," and saying that, "Simon in 1972 suggests that the filling of Lake Hattie Reservoir near this shock may have induced this seismic activity." So we want to know how and for what radius of the region of influence for geological resources can you guarantee there will be no artificially induced tectonic activity? How will you control unrelated projects that could activate tectonic movement in the earth? What is your guarantee that there will be no radioactive leakage or other pollutant problems with the MX silos? 1466 133

Ranchers and municipalities draw their water from aquafers that could be contaminated by a leakage.

Reservoirs and intermittent stream flows are supplied by the ground water and could also be contaminated. How will your proposed gravel mining in shallow alliviums 1325

affect the ground water quality? 1325

And what are your guarantees that there will be no tectonic movement in the silo areas? I think I've covered that section on tectonic movement well enough. 1466

I want to say that we don't know a lot about the ground water. It's underneath the ground, and it's not visible to us, we don't know the extent of it. And we don't have enough information on it to be able to tell how much water will be affected. How will it affect what's left of our ground water supply? And the other big question of this area is what is your plan for the silos located in the T Flight location and affected by the Wheatland-Whalen Fault Zone; and for that we refer to the page 2-120 and page 2-121, very clear diagrams that show the present locations of those. You all know about them. 1322 1471

Okay. Our last concerns are with the timing of this project. We felt that when you're working with weapons of this magnitude, you need to take a longer time period to make your decisions. There needs to be enough time for all concerned with the aspects that surround the issue to have a much longer time to research and review reports. I think I will conclude with that. Thank you. 123

COLONEL SMITH: Thank you, Ma'am. Major Taggart will answer some of your inquiries concerning

water supply and a ground water system; and following that, Lieutenant Colonel Padfield will answer some of your concerns with respect to the silo and its interaction with the fault.

MAJOR TAGGART: It's difficult to entirely review the analysis of water resources that has been done, but first I would like to assure you that we have worked extremely closely with the State Engineer of the State of Wyoming, Mr. Christopulos and also have spent time with the Department of Water Resources in Nebraska concerning our projections on demand and water supply in the deployment area.

And in this case have conducted discussions with the Cheyenne Board of Public Utilities concerning municipal water supplies in the Cheyenne area. You may ask why do we emphasize that particular area, and it's clearly based on the induced populations projections found in the document.

We have analysed rather extensively the Crow Creek watershed. I would agree with the solution that there isn't a tremendous wealth of information about ground water in Laramie County, but there is a considerable amount, and we have done quite a bit of work on our own on enhancing the knowledge of the ground water system in Laramie County.

We are presently measuring the area around the municipal -- three parts of the municipal well field.

You asked how we would obtain water rights in the Crow Creek watershed. We don't presently foresee a need to obtain water rights. There is a need to enhance the water supply in Cheyenne, and we suggested in there some methods of meeting the issue and needs in Cheyenne.

In the deployment area, as you well know, the need for water in the construction effort is extremely minimal. And we suggest, and it's a conservative statement that the water supply needs to be in the area of 500 acre feet. That's distributed over the entire missile area.

There are different methods. One is developing new wells, but it's much more likely based on the existing water supply in the area that water can be purchased on a temporary use basis from existing water rights holders.

You asked whether drought conditions were included in the scenario, and in the analysis, clearly they were. There were drought conditions. The well field in Cheyenne was used on the order of 7,000 acre feet in the late '70's. That will factor into the analysis.

Coming up with the water use and water demand, water supply figures. I think that covers the questions that you asked concerning water rights, water use, and

the proposed watershed in the deployment area.

MS. SCHURE: Can I ask you about the Stage 11, 1985 water impact if the water does go above the supply?

1347

MAJOR TAGGART: We presently project in there a possibility of the demand exceeding the supply on the order of 190 acre feet, and I would point out to you that that is assuming that the well field is used at the rate of approximately 2,000 acre feet per year.

As I pointed out in the late '70's, it was used at the rate of 7,000 acre feet per year. And historically the average has been in excess of 3,000 feet per year.

In addition we're looking at other ways we could supplement the use of water where we do not have a demand, that there would be demand in excess of supply of that 190 acre feet.

MS. SCHURE: You mean by reusing your waste water?

MAJOR TAGGART: That is one of the aspects that's being looked at. There are several others that are being looked at.

One, as I pointed out working with the Cheyenne Board of Public Utilities and the State Engineer's Office in our efforts.

MS. SCHURE: Would you consider mapping out

a cone of the depression of your wells for us to look at?

MAJOR TAGGART: We intend to do drilling. If at all, we would follow the State Engineer's guidelines in coming up with how that is done. That's a matter of State water law, and we have stated on numerous occasions we intend to fully follow State water law.

What I'm saying is presently there is not a projection. We would be drilling wells in the deployment area. Coming up with a cone of depression just on a selective basis isn't very logical.

MS. SCHURE: Thank you.

LIEUTENANT COLONEL PADFIELD: The Air Force is aware of the fault zone. We are aware of what's in the current literature. We have done some limited seismic studies.

Each of the Minuteman sites, when they were originally surveyed, had seismic tests performed and core drilling done. There is no major evidence of faulting, cracking, or activity in any of those cores or from the seismic activity.

We are continuing to analyse the activity issue in the DEIS. We will do more in the final Environmental Impact Statement.

Each of those silos was originally designed to meet very rigid specs. The modifications that we are

performing and the equipment that we are putting in our Peacekeepers have additional stringent requirements.

When we look at a map of the United States and look at the probability of the damage due to seismic activities, we see we're in a Zone I, where we expect only minor damage. If we look at critical, we see it's in mainly a Zone IV, expecting great damage.

We have analyzed the shock isolation system, which isolates the activity in the cannister from motion of the silo. We have analyzed that system assuming a Zone IV seismic activity.

That type of activity is what we would expect if we had a missile in a zone out on Vandenberg Air Force Base. We see the shock isolation is negligible compared to what it's designed to do.

Again, the safety issues, we will continue to analyze. You mentioned leakage. The nuclear material is not only sealed, it's protected.

It's shielded. We've never had a problem in 19 years in the basing of Minuteman of that type of material.

MS. SCHURE: The only comment I would make at this point would be when you're considering a weapon of this magnitude that can do as much destruction, you're considering a weapon you've never considered in the past; and I think you should be putting it in a Zone O.

You can weigh the odds, the positive odds against the negative odds; and say, "We'll have to go with this, and those positive odds did outweigh the negative."

But when you're talking about a weapon as destructive as this weapon, you shouldn't have any negative odds to consider. You've got to have a perfect situation to put it in.

LIEUTENANT COLONEL PADFIELD: The design of the silo is sufficient for what it's designed to take as near as we can tell, and our analyses are continuing. The magnitude of ground displacement and/or ground motion would not cause any damage to the missile inside the silo.

MS. SCHURE: What about people whose concrete structures are also cracking in this area because of our soil movement? 134

LIEUTENANT COLONEL PADFIELD: I hate to mention this, but those are not the same requirements that we have for the Minuteman. What I mean here is the nuclear requirements which these weapons are expected to see.

COLONEL SMITH: We thank you very much. I have no other cards. At this time is there anyone who would like to make a statement or ask a question?

If so, if you would simply be recognized, and

come to the microphone and give your name and any group which you represent, we'd be happy to accept additional statements and questions at this time.

Do we have any additional statements -- or apparently we do. Address the microphone -- no, apparently not. A question then, I'm sorry.

I understand we have several staff representatives of your Congressional delegation present in the audience here today. We certainly welcome them and we welcome everyone else as well as we thank you very much for your participation in this meeting. We certainly appreciate your comments and your statements.

Once again written comments may be submitted by dropping them in the box in the lobby or by sending them to the address on the screen at this time with a postmark no later than the 28th of November, 1983.

Any additional comments from members of the panel? Apparently not. Ladies and gentlemen, thank you once again.

The hearing is adjourned. Thank you.

(Hearing proceedings concluded 5:00 p.m., November 3, 1983.)

C E R T I F I C A T E

I, B. SUE VAN BERKUM, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 68 pages constitute a full, true and correct transcript.

Dated this 10th day of November, 1983.

B Sue Van Berkum

B. SUE VAN BERKUM

A PUBLIC HEARING

ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR

PEACEKEEPER IN MINUTEMAN SILOS PROJECT

THE HEARING OFFICER: Col. Allan Smith

THE PANEL: Lt. Col. Reese Padfield
Col. Warren Hickman
Capt. Mike McMullen
Lt. Col. Peter Walsh
Maj. Dave Taggart
Dr. Dick Kramer
Mr. Fred Hickman

November 3, 1983
8:00 p.m.
Fine Arts Auditorium
Eastern Wyoming College
3200 West "C" Street
Torrington, Wyoming

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P R O C E E D I N G S

COL. SMITH: Good evening, ladies and gentlemen. Welcome to this, the fifth of seven scheduled hearings in my district in Nebraska on the draft Environmental Impact Statement for the Peacekeeper and Minuteman Silos Project.

I'm Col. Allan Smith, of Air Force Trial Judges, and I have been appointed hearing officer for this series of hearings. My role is simply to conduct the hearing. I've not been involved in the development of the Peacekeeper project, and I will not be making any recommendations or decisions concerning it.

First on the agenda this evening, there will be an explanation of the Peacekeeper project and a draft statement by Lt. Col. Peter Walsh, our briefing team chief. Following this presentation, statements, comments from government officials will be received. We will then take a brief recess, after the break, statements, comments, questions from individuals or representatives of organizations will be accepted.

We ask that speakers try and limit their statements to approximately five minutes. Questions will be answered by our team of experts and specialists. The hearing is scheduled to conclude at 11:00 p.m.

To provide the greatest opportunity for all who wish to present comments or questions, we request that you fill out one of the cards available in the lobby. Speakers will be

recognized from the floor only if time permits and only after all of those who have filled out a card have had the opportunity to make their statement.

If time does not permit you the opportunity to speak tonight, you certainly may submit written comments or statements. This may be done by presenting such statements at the desk in the lobby or by mailing them to the address on the hearing notice. That address will be placed on the screen at various times this evening.

A court reporter is present and a verbatim transcript of the hearing will be made. We also have a video tape of the hearing being made, and the video tape will act as a backup to the written transcript to insure that the written transcript is accurate and complete.

Capt. Pat Mullaney is present in the back of the hearing room to handle any special requests that members of the press may have.

We're now ready to have the briefing on the Peacekeeper project draft statement by Lt. Col. Peter Walsh.

Col. Walsh.

COL. WALSH: Good evening, ladies and gentlemen. I am Lt. Col. Peter Walsh, Director of the Environmental Planning Division for the Air Force Regional Civil Engineeer at Norton Air Force Base. In this position, I am responsible for the preparation of the Environmental Impact Statement for the

Peacekeeper in Minuteman silos Project.

Tonight I intend to summarize the major findings of the draft environmental impact statement issued on October 24 for the project. However, before reviewing the findings, I shall provide the background and content for the statement. Specifically, I shall cover the following subjects: first, I shall review events leading to the presidential decision to deploy the Peacekeeper in Minuteman silos. Second, I shall briefly describe the project. Third, I shall discuss the scope of the environmental impact statement. Next, I shall describe the process and methods used in preparation of the statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final environmental impact statement. The same briefing will be presented at all public hearings so everyone will receive the same information.

In accordance with the presidential decision of April the 19th, 1983, the Air Force plans to deploy the Peacekeeper Missile system within the 90th Strategic Missile Wing at F. E. Warren Air Force Base, Wyoming. In making this decision, the President was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the President on January the 3rd, 1983, to resolve key issues raised by Congress in the 1983 Defense Appropriations Act.

The project described by the President entails: Replacement of 100 of the existing Minuteman III Missiles with 100 Peacekeeper Missiles in the 400th and 319th Strategic Missile Squadrons located near Cheyenne.

In order to implement this decision, the following actions are required: Modification of existing facilities and construction of new facilities at F. E. Warren Air Force Base; modification of 100 missile launch and 10 launch control facilities in the aforementioned squadrons; installation of five additional buried cable systems connecting the two squadrons; and upgrading the existing deployment area road network.

The project will commence in early 1984, soon after the final environmental impact statement is filed. Initial operating -- operational capability, defined as the first 10 operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989.

Operations of the Peacekeeper will be similar to the Minuteman system. The major differences are in the transport and emplacement of the missile. The Minuteman stages are transported fully assembled and emplaced in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle, and emplaced in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now

at other F.E. Warren Minuteman silos. Initially, the Peacekeeper system will be as safe, if not safer, than the Minuteman system. An accidental failure of the Peacekeeper missile [illegible] Peacekeeper system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command. The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than one in ten million.

Since the presidential decision and its implementation requirements, the Air Force prepared the first Environmental Impact Statement in accordance with the Council on Environmental Quality Regulations. The statement assesses the impacts of the deployment and peacetime operation of the system, alternative ground elements, and the no-action alternative of retaining the existing Minuteman III Missiles. This statement does not cover the analyses of alternative basing modes, nor deployment locations for the Peacekeeper Missile. Provisions in the Department of Defense Appropriations Act of 1983, known as the

"Jackson Amendment," exempted the President's report to the requirements of the National Environmental Policy Act.

Likewise, analyses of other basing modes such as Super Fastbond or [illegible] ballistic missile defense are not included in this statement. They are excluded because first, they were not part of the President's decision; second, the Air Force does not intend to propose any of them in the reasonably foreseeable future; and third, Peacekeeper deployment is not connected to any of these potential systems. Furthermore, the environmental impacts of the nuclear attack are not analyzed in the statement because the effects of war are speculative and lie beyond the scope of the Peacekeeper deployment and peacetime operation.

Following the President's decision and subsequent approval by Congress, a notice of intent to conduct the environmental impact statement process and the schedule for scoping meetings was published in the Federal Register [illegible] 19th, 1983.

The scoping meetings were held between [illegible] and July the 8th, 1983. Public meetings were held in Pine Bluffs, Torrington, and Wheatland, Wyoming; and Kimball and Harrisburg, Nebraska. Additional meetings were held with the federal agencies in Denver, Colorado, and Kansas City, Missouri, and with Nebraska state agencies in Lincoln, Nebraska.

The purpose of these meetings was to obtain information

for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental resource in a two step process. Study areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project.

Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analyses.

Impacts were analyzed within both the regions of influence and in the areas of concentrated study. Four categories formed the framework for the impact analyses. They are area, timing, intensity, and significance.

Area is defined as either site, local, or regional. Site is where direct project activities occur. Local is the

city or other political jurisdiction surrounding the site. And, region is the previously discussed region of influence for each resource.

Timing is defined as either short term or long term. Short term is the period from commencement until the system is fully operational. Long term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission.

Intensity is defined as negligible, low, moderate, or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during project planning or requires extensive mitigation or extensive action to mitigate.

Upon completion of the analyses, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages. A set of 13 environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the document was published in the Federal Register on October the 14th. On that date, the document was also available at libraries and federal, state, and local agencies within the study area.

In this reivew, I shall present a description of each resource studied. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing, and intensity of adverse impacts. Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rationale for such judgment will be given. You may follow my presentation by referring to the table on the inside of the handout made available to you as you entered the auditorium.

Employment demand. Employment demand describes the available regional labor force which may be used by the project, and the demand for non-local labor which may result in the inmigration of workers and their families. The analyses indicates a short and long-term, beneficial effect on the City of Cheyenne and the region of influence because of increases in employment and income.

During the peak employment years 1986 and 1987, approximately 3300 persons will be employed as a result of the project. There will be about 1800 direct and 1500 indirect jobs. Approximately 1,000 of the 3300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements will be filled through either inmigration or weekly commuting.

When the system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of

these jobs will be filled by local residents.

Housing. Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demand. Local, short, and long-term beneficial effects may result from potential increases in sales value and retail income -- rental income due to increased housing demand in the Cheyenne urban area and the City of Kimball. There is, however, an opposite effect on the consumer, particularly, those on fixed income and the first-time home buyer.

The analyses indicates a local, short-term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the City of Kimball exceeds the projected net vacancy rate. Also, the market response would have to exceed the highest historical annual production level. The analyses further indicates local, long-term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as outmigration occurs during 1986 to 1990.

The local, short-term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

Public finance. Public finance describes the budgets, fiscal resources, and obligations of all governmental entities, including school districts and urban service areas. The analyses indicates a local, short and long-term, beneficial effect

because of additional revenue to governmental entities due to increased sales and property taxes, and other taxes and fees.

The analyses further indicates local, short-term, moderate impacts because many local governmental entitites would face potential budget imbalances. This would require either an increase in revenues or a reduction in service-related expenditures during peak project activity. The analyses also indicates local, long-term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

Construction resources. Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, structural steel, reinforcing steel, and steel rail. The analyses indicates that regional, short-term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analyses further indicates a regional, short-term, low impact resulting from the project's increased demand on regional production capacities of cement, aggregate, ballast, asphalt, and roofing.

Social well-being. Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions, and selected

indicators of behavior. A local short-term beneficial effect is anticipated due to the improved economy.

The analyses indicates local, short-term, moderate impacts as a result of inadequate local, public, and [illegible] resources available to deal with the social adjustment and social integration problems associated with the immigration of population.

The analyses further indicates that the local, short-term impacts were judged significant because the population subgroups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job-seekers, adolescents, and fixed-income elderly.

Public services and facilities. Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety, and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal [illegible], fire protection, health care, human services, and libraries.

The analyses indicates local, short-term, moderate impacts. These impacts are due to a 7 percent increase over what is projected for the student population without the project in Laramie County School District Number One in the peak year, 1987.

Also contributing to the impacts is the need for

additional firefighters, vehicles, and space for the City of Cheyenne Fire Department; the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne; and increased demands in health care and human services.

The analyses further indicates local, long-term, moderate impacts are a result of continued need for additional staffing and classroom space in Laramie County School District Number One. These impacts are also the result of the need for additional law enforcement in the City of Cheyenne.

The local, short-term impacts were judged significant because of the overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control, and the potential for human service needs that are unsatisfied.

Utilities. Utilities describes water treatment and distribution systems, wastewater systems, solid waste systems, stormwater facilities, and telephone service.

The analyses indicates that site, short-term, low impacts are a result of a further overloading of existing sewer downstream of the F. E. Warren Air Force Base sewer and the need for additional on-base telephone equipment.

Local, short-term, low impacts result from the further degradation of the performance of existing wastewater systems in the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste. Collection and disposal and stormwater facilities in

Cheyenne urban area as a result of new land development in the region.

The local, short-term impacts were judged significant because the overloaded operating condition of the wastewater systems in the Cheyenne urban area and in Torrington will be aggravated.

Energy resources. Energy resources include the supply and distribution systems for electrical power, natural gas, petroleum fuel, and coal.

The analyses indicates local, short-term, moderate impacts as a result of the need to expand the capacity of a local electrical substation serving F. E. Warren Air Force Base by about 40 percent.

Local, long-term, low impacts result from increased energy demands. The analyses also indicates regional, short-term, low impacts as a result of the depletion of nonrenewable energy resources from the construction phase of the project. Regional, long-term, low impacts are a result of the depletion of nonrenewable energy resources by Peacekeeper operating personnel.

Transportation. Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design, and operation of roads, railroads, aviation facilities, public transit, and pedestrian and bicycle facilities. A

long-term, beneficial effect is anticipated due to the improvements to roads and bridges at the site, local, and regional levels.

The analyses indicates site, short-term, low impacts as a result of construction activities on and near roads in the deployment area. Local, short-term, moderate impacts are indicated as a result of reductions in the level of service at 11 of 24 impacted intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F. E. Warren Air Force Base Randall Avenue Gate due to the influx of construction workers and materials onto the base.

The analyses further indicates regional, short-term, low impacts as a result of existing capacity constraints and increased demand at Cheyenne Airport.

The site, short-term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternate travel routes. Local, short-term, moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area, and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land use. Land use comprises both urban land uses in developed communities where population inmigration is expected and rural land uses in the deployment area where direct

impacts from the project development would occur. A local, long-term beneficial effect may occur from the infill of the vacant areas within the city boundaries of Cheyenne and Kimball.

The analyses indicates site, short-term, low impacts are a result of the temporary interruption of agricultural land use during cable trenching. The site, long-term, low impacts are a result of restrictions on residential land use within explosive safety zones.

The analyses also indicates local, short-term, low impacts are a result of the underutilization of land developed to support mobile homes beginning in 1987 as outmigration begins. Local, long-term, low impacts are a result of the continuing underutilization of land developed to support mobile homes.

Recreation. Recreation includes regional, resource-based recreation which is related to federal, state and other lands offering rural outdoor recreation opportunities and local, user-based recreation which is related to municipal and county-owned parks and facilities within urbanized areas.

The analyses indicates local, short-term, moderate impacts as a result of increased demand for parkland, facilities, and staffing. The analyses also indicates the local, long-term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation system, requiring additional expenditures for operations and maintenance.

The analyses further indicates regional, short-term, moderate impacts primarily as a result of the increased demand at Medicine Bow National Forest, and Curt Gowdy, Glendo, and Guernsey State Parks. These regional impacts become low in the long term due to reduction in the number of users when outmigration occurs.

Local, short-term, moderate impacts were judged significant because of the need to seek funding outside of the normal budgetary process in order to provide additional local parkland and recreational facilities.

Regional, short-term, moderate impacts were judged significant because the additional use of regional recreational facilities will exacerbate an existing overcrowded situation, thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

Cultural resources. Cultural resources include four separate elements: Paleontological, prehistoric, historic, and American Indian cultural resources. The analyses indicates site, short-term, moderate impacts as a result of ground-disturbing activities associated with Peacekeeper deployment that may affect historic and prehistoric sites.

The analyses also indicates site, long-term, low impacts as a result of the use of buildings at F. E. Warren Air Force Base currently listed on the National Register of Historic Places.

Visual resources. Visual resources include scenic resources and the visual environment, as well as an evaluation of the visual quality of the region. The analyses indicates site, short-term, low impacts due to clearing of vegetation and grading activities during construction.

Water resources. Water resources includes groundwater hydrology and quality, surface water hydrology and quality, water use and demand, and constraints on water use.

The analyses indicates site, short-term, low impacts at F. E. Warren Air Force Base, launch facilities, and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology.

Site, long-term, low impacts are a result of permanent changes to stormwater runoff characteristics. The analyses also indicates local, short-term, moderate impacts because induced water demand exceeds the projected capacity of the existing delivery system for the Cheyenne urban area.

Local, long-term, low impacts are predicted because of increased water demands, increased surface runoff, and increased erosion and sedimentation in the Cheyenne urban area. Regional, short-term, low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development.

The local, short-term, moderate impacts are judged significant because of interference to existing water users and

potential water quality and flooding problems.

Biological resources. Biological resources include vegetation, wildlife, fisheries, and unique and sensitive habitats. The analyses indicates site, short-term, moderate impacts as a result of the potential immediate disruption, by construction or modification activities, of riparian vegetation and wildlife habitats.

The analyses also indicates site, long-term, moderate impacts as a result of construction activities that may potentially disrupt trees and shrubs in riparian and wetland habitats that have long recovery periods.

The analyses further indicates that there are regional, short-term, moderate impacts. These are the result of general recreational pressures, poaching, dog kills, and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park. Regional, long-term, low impacts are a result of the random shooting of the Swainson's Hawk and other birds of prey.

The site, short-term, moderate impacts were judged significant because of the limited extent of riparian and wetland habitats. The site, long-term, moderate impacts were judged significant because of the long recovery periods of the riparian vegetation.

The regional, short-term, moderate impacts were judged significant because of concerns about the random shooting of

birds of prey and the effects of increased human activity on big game in areas of concentrated recreation pressures. Regional, long-term, low impacts were judged significant because of concerns over declining population -- populations of some species of birds of prey.

Threatened and endangered species. Threatened and endangered species include plants, wildlife, and aquatic species which are protected by federal law as threatened or endangered. Also included in this category are state-protected rare, threatened, or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because of special state concern.

The analyses indicates site, short-term, high impacts as a result of the disturbance of the habitat of the Colorado Butterfly Plant and the Woolly Milkvetch. Site, high impacts will continue in the long-term as a result of the loss of habitat for the Colorado Butterfly Plant.

The analyses further indicates regional, short-term, low impacts as a result of the potential for random shooting of the Bald Eagle and accidental catching of the Greenback Cutthroat Trout. Regional, long-term, low impacts are a result of the continuing potential for random shootings of the Bald Eagle.

All of these impacts were judged significant because the Bald Eagle and Greenback Cutthroat Trout are federally-listed endangered species; also, the Colorado Butterfly Plant is

categorized as a Category One Species by U. S. Fish and Wildlife Service, and the Woolly Milkvetch is listed as rare by the Wyoming Natural Heritage Program.

Geologic resources. Geologic resources include geological hazards, energy and mineral resources including aggregate, and soil resources.

The analyses indicates site, short-term, low impacts as a result of the potential for soil erosion during construction activities. The analyses further indicates local, short-term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading.

The analyses also indicates local, long-term, low impacts resulting from the need for aggregate resources for road maintenance.

Noise. Noise analyses includes vehicular, air, and railroad transportation, and construction activity. The analyses indicates that the impacts will be negligible.

Air quality. Air quality describes the effects of project construction, operation, and related transportation activities upon future air quality.

The analyses indicates local, short-term, low impacts. These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a

result of construction activities.

As previously discussed, project alternatives were analyzed. These analyses focused on alternative road configurations, cable routes, and staging areas. The analyses have demonstrated that for most of the resource areas, the level of impact is either negligible or low and not significant, and does not vary within each of the three sets of project element alternatives. For four resource areas, transportation, land use, cultural resources, and biological resources,there are variations in the level of impact among alternatives. I shall summarize these:

As shown on this slide, three alternative egress routes for transporting the Peacekeeper stages from the base were considered. Alternative R-2, which is the proposed action, is designed to allow all northbound stage transporter travel to exit the base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack Bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road clearance problems, and the egress of the stage transporter at the Central Avenue Interchange and at Missile Drive interchange to travel north or south

Alternative R-3 involves providing stage transporter access to Interstate 80 via Round Top Road which would require

new on/off ramps at Interstate 80. Access to north -- to the north would still be via Interstate 25 near the Central Avenue interchange.

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads offbase, in addition to new on/off ramps at Interstate 80.

This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Round Top Road may tend to stimulate urban development west of F. E. Warren Air Force Base which would be contrary to the agricultural preservation land policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transporter route has the potential for intersecting cultural properties eligible for the National Register of Historic Places.

In addition, all three alternatives have a high and significant impact on the habitat of the Colorado Butterfly Plant because of potential disturbance during the construction phase of the project. This impact was judged significant because of U. S. Fish and Wildlife Service's Category One classification of the plant species.

For the project, five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corridors have been identified for environmental analyses.

Three alternatives follow overland routes; two of these follow easements previously obtained by the Air Force for communications cables. One alternative follows an existing road right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way.

Impacts among the alternative cable paths do not vary appreciably with the exception of land use, cultural resources, and biological resources. The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to the document -- to the documented presence of archaeological sites in the area which the cable will traverse and the high probability that these routes would destroy additional, presently unrecorded sites. The remaining four routes have been assigned a low or moderate impact, based on the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on

biological resources because of the likelihood of disturbing critical raptor, riparian, or aquatic habitats. Four of the seven alternatives would have moderate impacts, while the other three would have low impacts. The differences are due to the expected frequency of encountering the critical habitats. These impacts were judged significant because of the limited areas of these habitats.

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center.

The proposed action would have staging areas located on the base, and in Cheyenne, Wyoming, and Kimball, Nebraska. An alternative would have temporary support areas only on the base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered did not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the proposed action, that includes a staging area in Kimball, because of the potential of congestion on community roads. Similarly, impacts on cultural resources would be low for the proposals that includes staging areas on the base because of the presence of prehistoric and historic cultural resources.

In conclusion, the draft environmental impact statement

projects beneficial effects in employment demand, housing, public finance, construction resources, social well-being, transportation, and land use. It further predicts, that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transportation, recreation, water resources, biological resources, and threatened and endangered species.

To the extent practicable, standard practices that could avoid, reduce, or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures which could be used to reduce impacts have been identified. These include requesting funds through existing federal impact aid to school districts for Laramie County School District Number One. The Department of Defense and Wyoming and Nebraska government entities have agreed to enter into cooperative mitigation agreements which will set forth specific measures to be undertaken by the Department of Defense which will mitigate adverse impacts resulting from the project.

The statements, comments, and questions provided during the public hearings and written comments postmarked by November the 28th, 1983, will be analyzed. After the close of the comment period, the Air Force will review and evaluate all inputs to determine how they should be responded to and the need for revisions to the analyses contained in the draft

statement. The completion of this work will result in the development of the final environmental impact statement to be released by January the 31st, 1984.

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this evening.

This completes the briefing portion of the hearing. I shall now turn the program back to Col. Smith.

COL. SMITH: Thank you very much, sir. Let's take a break here for about ten minutes, then we'll return and take the comments, questions, statements, of anybody who desires to make such. So let's recess for about ten minutes.

(A recess was taken.

COL. SMITH: Ladies and gentlemen, we'll press on here with the remainder of the hearing. First, we'd like to recognize Mayor Ronne who is present here in the auditorium -- or at least he was a few moments ago, we certainly appreciate his presence. We also have staff representatives of your congressional delegation with us this evening.

I'd like now to introduce to you the panel of specialists and experts that we have and respond to your questions.

First, we have Col. Warren Hickman who is the Site Activation Task Force Commander at F. E. Warren Air Force Base.

Next we have Lt. Col. Reese Patfield who is the Assistant Chief of the Requirements Immigration Division of the Ballistic Missile Office at Norton Air Force Base, California.

We then have Maj. Dave Taggart who is the Staff Judge Advocate of the Air Force Regional Civil Engineer, Norton Air Force Base, California.

Next we have Capt. Mike McMullen who is the Air Force Headquarters Peacekeeper Liason Officer in Cheyenne, Wyoming.

Next, Mr. Fred Hickman who is the human resources director for U.R.S. Berger, San Bernadino, California.

And finally, Dr. Dick Kramer who is the Natural Resources Director for U.R.S. Berger, San Bernadino, California.

These are the people who will work with Lt. Col. Walsh in responding to your questions this evening.

We'll now proceed with the comments, questions, statements, from those who have filled out the cards in the audience. We request that you try and limit yourself to approximately five minutes.

The first card that I have is that of Verle Punke, I believe it is, Punke, P-u-n-k-e.

MR. PUNKE: Can I forward my comments to Jim first and then come back and make some comments later. I have another person, 'cause you may answer my questions first.

COL. SMITH: Surely, we can come back to you, sir.

MR. PUNKE: Jim Fuller is what I'd like to address my

questions to first.

COL. SMITH: What?

MR. PUNKE: Jim Fuller, he has some questions, if you would address his questions, then I think I could continue.

COL. SMITH: All right, we have a card from Jim Fuller here, apparently representing WAMX, Goshen County, I believe it is. We have a microphone down here at the front of the room and request that you use that.

Jim Fuller. Good evening, sir.

322 MR. FULLER: I just have a set of questions that I would just like to hand to the panel and have them go through the questions and answer them as completely as possible.

COL. SMITH: Could you possibly read them or perhaps -- I think it'd be best if you could read them -- or how many questions are there?

MR. FULLER: We have a total of five with comments, subquestions on each one.

COL. SMITH: Well, we can do it any way you'd like, but it perhaps would facilitate if you could read them.

CAPT. McMULLEN: Do you want the response here?

MR. FULLER: Yes, uh-huh, right.

COL. HICKMAN: Why don't you read them.

MR. FULLER: I have an additional copy --

COL. SMITH: No, that's all right.

MR. FULLER: Okay, these are some of the questions of

great concern from the residents of Goshen County resulting from the development of the MX missile. Number one, I would like to talk about the buried cable. To my understanding, this requires 35 feet of right-of-way during construction. Part of that question goes: What will the Air Force do as a result of damages as a result of buried cable? Second part is time delays, what kind of delays and times as far as to agricultural people are we looking at? Third part is settling of the land once cable is buried. I've heard from past correspondence that there has been a series of land settling as a result of digging. What time of the year will the trench digging occur? And can agriculture improvements such as additional pipelines be buried through these cable paths? That's the first question. 114 1138 1139 1138 1145

Now, do you want me to read --

COL. SMITH: Why don't we have the first one.

MAJ. TAGGART: Let's start off with the last one you asked, since that was the one that you were most interested in, which is once the cable easement has been acquired and cable is in place, what agricultural activity or what other activity could thereafter take place.

The cable line itself should not disturb in great measure normal agricultural activities. There are some markers which you're probably familiar with along the Hicks cable route that would exist out -- in on the range or on the farmland.

As far as what other things could be done besides

agriculture use, other things could be done as long as they're not inconsistent with the easement that's required to put that cable line in. You'd have to work on that on a case-by-case basis as to what that new and different use was, and whatever it is would just have to be consistent with the interest that has been acquired and thereafter belongs to someone else.

With regard to the actual operation, when the trenching would take place and what the effects of the trenching are, the schedule is not completely set as to when that would take place. Perhaps Col. Hickman could respond to the construction schedule in that regard, I don't know if anything has been set.

COL. HICKMAN: We were looking at doing that in the summer of 1987.

MAJ. TAGGART: As far as the activity itself and what kind of change there would be in the pasture land, the crop land, the obligation of the Air Force, of course, would be to restore that land back to its pre-existing condition. That would be part of the agreement that is struck with the landowner when the easement is put in place.

As far as damages, hopefully there wouldn't be any damages, the restoration would put the terrain back into its pre-existing condition, but there would be a provision for claims against the government if any should be necessary to be processed. But in the normal scheme of things, the area should

be restored to its pre-existing condition and the continued use of the land for agricultural purposes should not be inconsistent with the laying of the cable.

I think that that -- Did I get all of the five parts of your inquiry? I tried to address that in terms that it would be restored to its pre-existing condition.

MR. FULLER: To my understanding, you're going across 127 acres of irrigated land; is that right? That's what the impact statement says.

MAJ. TAGGART: 127 acres?

MR. FULLER: Yes, of irrigated land. I'm talking specifically of irrigated land.

MAJ. TAGGART: That's -- That figure may or may not be accurate, depending on what routes are ultimately selected. As was mentioned, there are a variety of routes that could be selected from.

MR. FULLER: So you're saying that in addition, there could be more?

MAJ. TAGGART: Or less, yeah.

MR. FULLER: I want to get back to that, 127 acres, now, is that easement? Is that the easement right-of-way, or is that acres that it involves?

MAJ. TAGGART: That's the acreage of the disturbed area.

MR. FULLER: Of the easement?

MAJ. TAGGART: Yes. I'd have to go back and refer to that particular passage, the disturbed area to put the cable in for the length of the cable route.

MR. FULLER: One of my grave concerns is that if you go through in the summer of '87, say that this is irrigated land, you go through a middle of the field that contains 160 acres, you only take easement of 35 foot of right-of-way, in essence, if you go through the middle, in essence, you can't irrigate the rest of that 50 acres.

Now, will the government pay for damages for the total of that 50 acres, because there will be some settling?

MAJ. TAGGART: We would have to evaluate what the value -- fair market value of that easement is at the time that it is acquired. And if that is proper measure of the fair market value of the interest acquired, then yes. 114

MR. FULLER: Now, I'm saying: Is that applicable only to those acres under the easement, or is it also applicable to those acres that are being effected as a result of the digging?

MAJ. TAGGART: Well, the answer to that is it would have to be evaluated based on the circumstances of the particular real estate interest that is acquired. I can't tell you what the answer to the situation is until we know what the particular case is. Each case is unique and to its own when you acquire a piece of property, which you all know.

MR. FULLER: Go back to my example of, say, if it's 100 acres square and you cut it in half and 50 up on the top part and 50 on the lower, with the digging going in between, would the Air Force try to make an adjustment for the lower 50 acres? I guess that's basically my question. 114

MAJ. TAGGART: Well --

MR. FULLER: I mean, don't you feel that because . . .

MAJ. TAGGART: As I said, I think the best way to answer that is it would have to be evaluated when the case comes up to see what the value is.

MR. HICKMAN: The effects on agriculture were addressed both in the economic section and within land use. And within land use is where we estimated that up to 160 acres could be temporarily disturbed.

At this point, without having the exact timing of the disturbance that would take place and without having actually the five final routes selected, we are not able to provide an evaluation of the interruption in an agricultural activity that might take place.

I would say as a maximum, it would be possible that a growing season could be interrupted especially if it were in a critical period of planting or harvest. But at the present time, without precise schedules, we're not able to give a firm estimate of what the interruption might be.

MR. FULLER: I'll go on to my second question. My

second question deals with land use.

Part one is if additional land is required, but can improvements or buildings be constructed near launch sites? Part number two is: What alternatives do families located near launch sites have? Part number three is: Can irrigation improvements be located near the launch sites? And part number four, the last part, what if excess trash is noticed around silos and roadways, who should be contacted for removal? 188 185 188 175

CAPT. McMULLEN: In response to your question, I presume you're referring to the safety zone that we are looking at around the launch facility or silo. And with reference to the inhabited structures, there are associated farm improvements located in that area.

The safety zone, of course, is designed for the purpose of inhabited structures. And we have identified nine homeowners that are within a planning quantity distance area or safety zone. That quantity distance for planning purposes is 1700 feet.

We will validate that through a testing program which will conclude in the spring of 1984. Then we will make, you know, we have to make a judgment as to what the disposition should be of those nine affected homeowners.

What we have done is contacted each one of them and posed possible solutions, offered some alternatives that the Air Force has looked at and considered. There may be others,

they're certainly not exhausted. At this point in time, we have offered a list and requesting any recommendations they may have.

But those three possible solutions are as identified in the draft environmental impact statement. One, they could sell their house, their inhabited structure, to the Air Force, and the associated farm improvements, while still retaining ownership of the land.

Two, they could sell their house to the Air Force, use the proceeds to buy a new house or build a new house outside of the quantity distance or safety zone area.

Three -- Or let me back up, as part of that option, they could also ask to the Air Force to assist them in relocating that house outside the safety zone.

The third option is one of exemption, where they could seek an exemption from the safety zone rules. And so as not to be disrupted and moved, they could stay right there within the safety zone. And why we offer that is we feel very confident in reliability and safety of the missile. We've never had an accident with the Minuteman system, and we expect the same safety record with the MX or Peacekeeper missile, due to the fact that it has the same type of propellants in it, even and more importantly, those propellants have been refined and improved from a safety aspect.

Under the terms of benefits, the question regarding benefits -- I might add, the exemption is not an exemption of

liability on the part of the Air Force. In other words, if they sought that exemption and acknowledged that they lived within the safety zone, the Air Force would still be liable for any damage to their property or to their inhabited structure or associated farm improvements if an accident occurred.

Regarding benefits, under the Real Property Acquisition and Relocation Benefits Acts, there are provisions for compensating the landowner for that, any relocation or any purchase of the property or any value that is placed on that land that is acquired in that safety zone or restrictive easement.

In terms of irrigation, to the best of my knowledge -- maybe Maj. Taggart can help me on that -- there's no restrictions in the -- at least the existing easements we have now, the existing restrictive easements around the Minuteman system that prohibit wells or irrigation or even oil wells from being drilled within that restrictive easement.

The last question with regard to trash, the responsibility will lie within -- In terms of monitoring -- will lie within the Site Activation Task Force Commander, who is right here to my right, Col. Hickman. He might have a comment with that.

COL. HICKMAN: Certainly, while we're doing the project that we would -- you could contact us at the base. If you're talking about sites today for trash or something, you

can contact the 90th Strategic Missile Wing, certainly they would take care of that, down at Francis E. Warren Air Force Base.

MR. FULLER: My third question deals with the Wheatland-Whalen Fault Zone represents a potential for earthquakes. The question is: What are the consequences of an explosion of a launch site as a result of an earthquake? 174

COL. PADFIELD: To date, 19 years, we haven't had any problems, burnings, detonation of any Minuteman. As far as explosions in the site, should they occur, we are doing the testing now and finishing in the spring what we call our quenity distance test so we know what the distances are for the normal pressure that results in any ejections that ejected. And until we finish that -- Well, I understand that should there be an explosion we will then know what the answer is, how far to make the exclusionary rule. We don't actually know that today, we're assuming it's 1750 feet.

As far as an activity within the zone occurring, causing that explosion, we don't think that's very possible today. We know what the sites are, we know the two sites that are in the zone. When those sites were originally surveyed, we did seismic activity tests, we did coring, we found no major evidence of any activity.

We have tested our new shock isolation system for the Peacekeeper in a zone of activity that's much greater than

it is here, like out in California we're testing it at Vandenburg Air Force Base, and the results that we see are essentially insignificant compared to what the system is designed to take.

MR. FULLER: I'd like to go back just a second. You say you don't know the distance for sure as a result of an explosion? So you're saying that in essence, that maybe -- This may be at a later date after you're testing that maybe this distance may not be far enough?

CAPT. McMULLEN: Are you referring to the safety zone or the planning distance --

MR. FULLER: Yeah, 1750 feet, I believe.

CAPT. McMULLEN: Yes, that's correct, we have identified that for planning purposes. And that's based on a technical mathematic computation. In simple terms, this missile is about 10 feet taller and 2 feet wider, thus carrying slightly more propellants on board. And a resulting explosion could be carried out to that point, 1750 feet, that's a computation, some assumptions that the technicians have made. But we want to validate that before we make any decision, before a ranchowner has to make any decision, and we've told them that. And that's what we're referring to as far as the validation and tests and analysis program being concluded. **185**

Does that address your question.

MR. FULLER: Yeah, I believe so. So then after you do this testing, is there any chance of rebuttal, maybe you find

the distance as, instead of 1750, 3000 feet. Is there any chance that you may swallow up more farm homesteads or whatever as a result of that testing? **185**

CAPT. McMULLEN: Sure, I can't deny that the tests may show that we may have to extend it beyond 1750. The opposite is true as well, it may show that we may reduce it or keep it as what it is now at 1200 foot restrictive easement.

MR. FULLER: I'll go on. Next one addresses water and electricity, I have three parts to that. First part is: Water to be used will have to come from a local source. In the event of a drought, will the Air Force have priority to irrigators? **198**

Next question: Will the electricity have to be shut off for any period of time? And the third part is: Will these shutoffs be during peak demand for irrigators?

MAJ. TAGGART: I'll answer the first part about the water, and I think that Mr. Kramer -- or Dr. Kramer will answer the part about the electricity.

They ask the question, where will the water come from and the suggestion you make is that it will come from sources that are presently in operatio for irrigation. That is certainly one possibility in the deployment area, that we would obtain water by purchase from existing irrigation uses. **962**

Similarly, we may look to other existing uses to purchase water or develop a source of water ourselves. I think the

greatest probability at the present time is that we would seek water from an existing use, perhaps a municipality that has water that we can purchase by going through the temporary use permit system of the State Engineer. We're looking at several possibilities.

As far as prioritization over an existing irrigation right, if you look at the amounts of water that we're suggesting we would use over a five-year period, I don't think that prioritization over an existing water right holder is very reasonable and very logical. We're talking about 500 acre-feet over a five-year period over the entire deployment area, it is not a very large amount of water.

COL. HICKMAN: Let me address the electricity question. At this time, we do not anticipate any interruptions to the private user system to the sites. There will be no changes in that, no upgrading in that system to the sites, so we envision no interruption to the power system of the site. **962**

MR. FULLER: I guess I'd like to make a few comments. As far as electricity, you don't anticipate any. What if we do have some? What if, like, during the summer of 1987 we do have a drought condition and electricity does go out, wherein it's -- as irrigators, it seems like the electricity at certain times, when there's a thunderstorm or whatever, it's very temperamental, the way it seems around my area, and I'm saying: What are the chances, and if there is any chances, what is the result?

COL. HICKMAN: Well, first, the chances are very low that we will cause that, you know. We're going to be modifying the site, but our modifications are internal to the site, and the power that's delivered to the site, there's no changes in that. And the power use leaks is very close to approximately the same after we complete the modification of the site.

While the site is down for modification, of course, the power reduction will -- power use will be less because the site will not be operating. We -- You know, quite frankly, we don't see how we will cause an increased drain on the power system or a disruption of the power system. And our requirements for the system and our planning for the system all are based upon that type of an operation.

MR. FULLER: According to the impact statement, it says you'll have quite an effect on electricity, I mean as far as consumption use.

COL. HICKMAN: But that consumption is primarily at Warren where they're constructing quite a large number of support facilities, that's not out in the deployment area. And also, the power that those facilities will use, you know, at Warren, once they're up and operating.

MR. FULLER: Yeah, I understand that. But at the launch sites, as far as additional electricity for construction, there will be none?

COL. HICKMAN: There will be no additional over what's

supplied to them now.

MR. FULLER: And getting back to the water question just a little bit. I realize that the water, according to the impact statement, says that there will be very little water utilized. But I'm still -- I guess I'm concerned about in a drought condition, during the drought condition, us irrigators -- 198
or we irrigators seem to have a battle over water anyway, and I'm just wondering if there is a chance that the Air Force will want some of that water.

MAJ. TAGGART: Well, it's very difficult for the Air Force or for the farmers in this area to predict when a drought condition would occur. We have attempted to analyze the impact on water resource. We have, to the best of our ability, identified what that water demand is, and we have worked very closely with the State Water Engineer.

Recognizing that within the three-county area in Wyoming where there is potential for use of water and an impact on that resource that there are groundwater control areas, and we're trying to come up with the appropriate methods for acquisition of even the small amount of water that we seek to use in the construction process as consistent as possible with the existing uses so that we would not interfere with those. But I'd like to assure you that we are looking very closely with the State Engineer and have agreed to follow the requirements of the State's water laws to the fullest extent.

For me to predict what would happen in drought conditions is not possible but highly . . . We will follow State water laws, we have identified the amounts and use and tried to identify the reasonable methods to acquire that small amount of water that would be necessary for construction.

MR. FULLER: Thank you.

The last one deals with hazardous materials, and this is a tough one for me 'cause I don't know all about hazardous materials, but I guess I'm trying to learn more about it. I have essentially five parts to this, and they are: The use of plutonium is extremely dangerous, what steps will the Air Force take to educate people in the event of mishap or accident? 155

Number two, will our land produce or drop in productivity if plutonium is released? Number three, can animals be harmed by plutonium? 168

Four, if a spill or accident does occur, will all roads be shut down? 155

And number five is: The solid and liquid propellants are extremely dangerous, what are the consequences of their detonation? 154

COL. PADFIELD: Plutonium is dangerous. We have not had any accidents in the full 19 years within that system. The plutonium is sealed, it is protected, it is in the re-entry system inside the silo. We have never had any leaks -- leakage, it's a solid material, not a liquid anyway.

We have gone through a series of tests and analyses to certify that the containers that the systems are shipped in,

as well as the stages with the propellants, that they meet the safety requirements for nuclear weapons. Independent agencies have been established both in DOT and the Air Force to certify that the design of the systems that we have to transport our system are adequate. Being that we have not had an explosion in 19 years of either propellants or re-entry system, we think we're doing -- at least we're in the right direction.

As far as that, the spill or effect on the roads, I can't answer that one, we haven't had one. Obviously, the Air Force does have accident plans, disaster preparedness plans, which they share with the local communities. The local communities are given educational -- the -- those activities, the fire departments, police departments, are given information of what they can do, what we expect them to do to help us.

The solid liquid propellants are very stable, and we cannot envision having those kind of problems.

CAPT. McMULLEN: We make every effort to work closely with the local civil defense people to make sure they are familiar with our handling of nuclear weapons. And as Col. Padfield suggested, we have very strict standards for the handling of those materials and inform the -- your people in the area, immediate area, of those responsible for civil defense matters, preparations, those type of things. And so we make every effort to education those key people.

COL. HICKMAN: There's just one additional comment I'd

like to add to that. In the design of the missile and of the re-entry vehicle, which is the -- one of the materials carried, we have many significant design improvements in the missile, and in that to make them safer. And so the missile is actually a safer design missile than Minuteman, although Minuteman has a perfect record.

MR. FULLER: I realize that in 19 years that Minuteman, there has been no accidents, but I guess I always plan for the worst and hope for the best, and I guess that being just like the Big Thompson, they didn't have a flood in 100 years and they had one.

And I still think that, I know that you've given materials to the civil defense and everything, but I think it's still -- I'd like to see the Air Force more involved in this area in trying to educate the people. I mean, not only pushing the civil defense, but also by pushing every agency, and also some kind of courses offered by the Air Force exclusively for this area in trying to educate the people and how we can handle this, because even if we have just one accident alone, as the people from Three Mile Island will tell you, it doesn't take any more than one accident to result in a tragedy. And I think that this is a very grave -- and I realize that in 19 years Minuteman has not had any, but all it takes is one. 155

And I just hope that the Air Force does try to educate the people in more ways and maybe going through the civil defense.

We've got to have some kind of liason, or my suggestion is that even during the five years of impact of the MX missile that you place -- I realize in Cheyenne that there is also a person you contact there, but I also suggest that you stick one in Torrington for anybody that has suggestions, rebuttal, anything, whether it be with the cable, hazardous materials, to answer those questions.

CAPT. McMULLEN: We appreciate your comment, especially regarding safety, because safety is especially paramount. With respect to the recommendation about having a liason officer up here, I am the individual, the liason officer that you referred to in Cheyenne. And my responsibilities extend throughout Wyoming and Nebraska, and I periodically get up here into this part of the area and plan -- and we are considering at least looking at establishing some office hours up here. We're limited on manpower, obviously, and it might be difficult to establish a permanent liason officer up here. But I'm more than willing to come up and talk to you and address any questions you have. And by all means, if you need immediate response to a question, feel free to call me in Cheyenne.

MR. FULLER: I've had several -- Well, not several, but I've had people tell me that during Minuteman III, during buried cable or whatever, that they did have problems and that they thought it was time consuming and rather laborious to try to make trips to Cheyenne, calls to Cheyenne. That is why my **126**

suggestion for a person here in the Torrington area. I realize that the manpower -- that under the circumstances and the magnitude that we're dealing with in this MX missile, I feel that it's utmost important to have someone here. I think you need to be here 24 hours a day to answer anybody's question, because if you can educate people on mishaps or something like that, I think that's of the utmost importance. **126**

COL. SMITH: Thank you very much, sir.

MR. FULLER: Thank you, sir.

COL. SMITH: The next card that I have is that of Stephen Keogh of Torrington. Is Mr. Keogh here?

MR. KEOGH: My question has been answered.

COL. SMITH: All right, sir, thank you.

The next question I have is that -- or the next card I have, I should say, is that of Carie, I believe it's Carie Campbell, also of Torrington.

341 MS. CAMPBELL: Yes, sir, I think you can probably answer this very quickly.

As I understand it, this is the first draft of the environmental statement. Then the experts look and take questions and comments until the 28th of this month. The final draft would be done in January of '84. At that point, where do citizen's comments come in and what is being done to get this final draft to the citizens out here? **29**

COL. WALSH: We will take your written comments and

verbal comments and analyze them and see if there's a need to change the analyses that is contained in the DEIS.

We have an obligation to respond to every comment that we receive so that if a comment is received here and we deem that it is not appropriate or is not relevant to this document or for some other reason decide we are not going to take any other action based on that comment, we still have an obligation to inform you via document that comes out on the 31st of January of the reason why we did not incorporate your comment into the document.

The document will be made available on the 31st of January, and again, it will be distributed throughout the study area.

MS. CAMPBELL: Thank you, sir.

COL. SMITH: The next card that I have is that of Carol Kinney, also of Torrington, I believe.

UNIDENTIFIED SPEAKER: She had to leave.

COL. SMITH: She left, all right.

Next card is that of Norman T. Kinney, is he present -- yes, sir.

363 MR. KINNEY: I have a couple questions. One is mainly what we've heard thus far has been a lot of we don't know or we don't anticipate, we don't think so.

How can the people here and the people that are outside that have not made it tonight make decisions on whether or not

this is a good idea? You know, you're giving us a lot of I don't knows, in essence, and we need to know. We live here, we're going to be impacted by this. You guys can sit in Cheyenne, we're up here in the heat of all this, and I'd like an answer to all that.

CAPT. McMULLEN: I would like to ask perhaps if you have a specific example of what we responded to that we didn't know so that we can be, you know, address that.

MR. KINNEY: I believe most of the things that Mr. Fuller's come up with, several in fact, you've responded, "We don't anticipate," for one, it's an accident. An accident cannot be planned. How do you anticipate an accident? It wouldn't be an accident then, would it? It seems like then that we need to know more information than what we're given right now.

CAPT. McMULLEN: All of the projections in terms of the environmental impacts associated with deployment with this project are addressed in the draft of environmental impact statement. There may be some areas that may be lacking or some things that you would like to see addressed, and that's the purpose of the public hearing is to solicit your comments.

In terms --

MR. KINNEY: We would like to have answers, not just give us your comments. I'd like to hear an answer right now as to an accident. What would happen if a missile detonated inside a silo? What happens to the plutonium that may escape, **168**

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will that be brought in and breathed by animals and the humans? **168**

CAPT. McMULLEN: You made a comment about it's difficult to plan for the accident; however, we do plan for the worst case scenario, that's precisely why we've identified safety zone requirements.

We are further analyzing those safety zone requirements to insure that we are accurate in those requirements. So I guess the -- That's the long and the short of it in the sense of answering your question. If there's something else you had specifically in mind, but that's one case in point where we do plan, as Mr. Fuller suggested, plan for the worst is kind of a good option. So we have to do that, even though we've had a *safe record with the Minuteman system*, as we've indicated; nevertheless, we plan for the worst situation.

MR. KINNEY: So then what is the plan if there is a detonation inside of a silo? What do we citizens do about something like that that's on our property?

CAPT. McMULLEN: That question is very difficult to answer in that it's difficult to give you a precise measurement, okay, or precise analysis. We are continuing to do that analysis, **155** we have identified for planning purposes at this point in time, that's why it is called a draft environmental impact statement. We are still in the refining stages and trying to do our best to seek out those answers. Some of the answers we have already some are still in the planning stage mode, but nevertheless, we

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are addressing those questions and concerns.

MR. KINNEY: I still have concerns that you are not answering my questions in the event of an accident. I think it's very relevant to the farmers and the ranchers in this area as well as to the city people that that be answered. That is a very crucial question.

CAPT. McMULLEN: Okay, Col. Hickman says he would like to respond to your question.

COL. HICKMAN: The Air Force has disaster plans, and *they have -- and those plans include teams* that would come out and they would -- working with the local officials would cordon off the area and they would clean up the area and eventually restore the area where that kind of an accident would occur. That's the basic essence of those plans, those plans do exist. **155**

MR. KINNEY: Then with that question in mind, or that answer, does that mean you're going to block off roads in order to do that and how big an area are you going to cordon off?

COL. HICKMAN: That would be dependent upon the individual accident. Now, we have identified the DD zones for safety, and those zones are currently small, so we're talking about fairly small areas, not wide -- wide blockage of roads if there were an accident.

MR. KINNEY: Okay then, what do civilians do that live in that area while we're waiting for the Air Force to come and clean up their mess?

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COL. HICKMAN: With the small area like that, I'm sure that *alternate routes can be* held.

MR. KINNEY: And also, can you guarantee us it's going **154** to be a small area?

CAPT. McMULLEN: We can't make any guarantees like that, sir, obviously, for the simple reason that it's just too difficult to make a guarantee. We plan for those type things, and we educate your civil defense people who are on the local scene, they should be educated and knowledgeable to react to any accident that may occur around or near one of our sites. And the Air Force, by various means, helicopter or the most expeditious means that we have available to us, will respond immediately to that accident.

MR. KINNEY: I have another question for you. If in the event that there is an accident, what happens to the plutonium that may leak from your missile? Does it go into the groundwater? Does it stay right on your silo area? Where is it going? **168**

CAPT. McMULLEN: Based on a technical analysis that has been done to this point, the plutonium would not be spread out, as you say, or enter into your water or irrigation system. It would stay within that confined area that it exists as it is stable in the silo.

MR. KINNEY: Thank you.

COL. SMITH: Thank you, sir.

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The next card that I have is that of Sandy Fuller of Torrington. Sandy Fuller?

UNIDENTIFIED SPEAKER. She had to leave.

COL. SMITH: She has left also.

The next card I have is that of Evelyn Lifsey. Ms. Lifsey.

Could you perhaps come down to the microphone?

298 MS. LIFSEY: I have a loud voice.

COL. SMITH: All right.

MS. LIFSEY: There's some, I think, some real serious problems with the way these hearings have been conducted. And, you know, I've had a number of conversations with most of you about the process and attempted to have phone conversations, but since there seems to be more money available for hardware, **126** it's often difficult to get to the liason office, your assistant is not employed by the Air Force, so the same problem is getting the person in Torrington, you barely have someone in Cheyenne.

I think the Air Force has been really, really undemocratic and has subverted the public process in this whole hearing process. And while each one -- each item is real minor and *different ones of you have answers* to each particular problem, taken together, they add up to a real reluctance to get public input. For example, the inability to get the draft in Cheyenne, and I know -- You know, this problem or that problem. But in essence, we just did not have access to the DEIS until well **17**

after the comment period -- I didn't get a copy until a week ago, and I'm not the only one. The technical reports were not available, we were told they're not available, and I understand that's all changed and fixed now, but here it is November 3d and the comment period is over in 25 days. 17

Then when we do get the book, you can't even make your way through it, it's not even in English. 44

But as I mentioned, difficulty of getting to Capt. McMullen, and I know you're very good about returning your phone calls, but you've got a three-state area to cover, but a $30 billion project, they ought to be able to get some help out here and answer these questions, and they've been requested all over the State of Wyoming. And we can't get an Air Force personnel that's qualified to discuss or authorized to discuss policy, and you're the only person apparently in the whole Air Force except for Tom (inaudible), to discuss Air Force policy. So we're left with no public hearings, even though I guess in Senator Simpson's office it was agreed that there would be public hearings any time they requested. 126

The comment period is really short, we're talking about 1,000 warheads in an extremely small area, and you've given us a 45-day comment period, which is abbreviated by the ability to get the comments and by a comment -- oral comment period that's shoved into four days, six towns in four days. The only town with more than 6,000 people in it is Cheyenne. 23

And the DEIS clearly states that there is major impact in northern Colorado, major impact in Scottsbluff where the head of the social services for the panhandle are, but you can't hold a hearing in Scottsbluff. The government -- Colorado and the congressional delegations both Republican and Democratic, and the mayor of Fort Collins and a lot of different cities requested hearings, and Colorado said no. And that's just, you know, "Blow 'em all off." And there are silos that are supposed to get the MX missile right on the Colorado-Wyoming border. You don't just stop right there on the border because there's a state line. There's going to be impact in a three-state region. 22

The notification of the hearing is really appalling, I was never notified. I found out by calling the Department of Commerce employee, Capt. McMullen's office, wherever they were. I don't think they were in the Denver Post or the Rocky Mountain News, which are the biggest regional newspapers around here. I know in the scoping hearings, Pine Bluffs didn't know about their hearings, I notified them about their hearings that day, that's why there were no public officials at the Pine Bluffs hearing. 18

I think the way that the hearings are held in these times, and I know all the times are inconvenient and the school programs and this and that interferes, but if that's the problem, and so that the only time you can have them is 3 o'clock in the afternoon when most people are working or 19

8 o'clock in the afternoon where we're left sitting here at 10:00, 11:00, 12 o'clock at night -- Last night in Cheyenne we didn't even get to finish our comments, then you ought to think about having one hearing each night at 7:00, 7:30, when it's most convenient. Do it around the convenience of the communities and not -- Well, the President wants us to have initial operating capability in December of '86 so we better hurry, so we've got to squeeze this whole process in -- That's a little stupid. 19

And that's -- That all adds up to -- I'm again questioning the extension of the comment period. I think it's rather interesting that in the letter that went out saying we're not going to extend the comment period, that is the clearest example of the grave public input, then I don't know what is. 23

I think to mention the technological, has to include everything in this region to be planned over the next several years, you can't talk about the water impact of the MX missile without knowing about all the other projects in this area, whether they're going to be mining, or power plant or future missiles or other Department of Defense things, you have to take that into account, and I think that requires that as well. 230

I think you should very closely examine premature thoughts, because this MX missile is the most political as opposed to military weapon system we've ever seen. 118

This House of Representatives, there was a nine point

spread, which means all you needed was five votes and the MX would have been turned around. We know that there were at least five Congress people who were not available to that vote for whatever reason. We know that there were five Congress people who did vote for the MX who said we're not going farther than 21 missiles. And you can bet that come next November with a new Congress and possibly a new administration, we're going to have a scrapped MX missile, and you've started all these projects and you'll have half of what's supposed to be done and then all you're doing is scrapping for a different set of plans or a different set of arms control, and that really needs to be discussed because people are being led down a primrose path. 118

I really cannot imagine that after all these years squeaking by with a margin of votes getting narrower and narrower that this weapon system is going to survive another twelve months. I think that the big generality about working with civil defense and getting everybody off their road and down the highway in case of an accident, I know that it's really a small chance of an actual bomb -- warhead detonation, not that there's always a first time, but there's a much higher chance in all the transportation and all the handling and getting it in and out of trucks, and whether they have their lights on or not so people can crash into semis and all kinds of things can happen where a leakage can occur. And I know that Lawrence Livermore 155

(phonetic) have a study out that with the leakage -- not a detonation, a leakage can cause a 28-mile radius of contamination and that's -- Plutonium has a half life of 500,000 years. You don't just say (inaudible).

This is a really serious thing that has to be considered, it's not a one in 10 trillion probability. So there needs to be some real mitigation thought out and there needs to be some real serious evacuation plans, not civil defense who come and hand you a pamphlet and says, "Here's how you build your bomb shelter, throw some dirt over it, and you'll all be safe."

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I also think that the DEIS should consider what you're going -- what storage you have for the Minutemans you're pulling out of the silos. These are all Minuteman IIIs, which are modernized for the most amount of technology and modernization taking place, these aren't the Minuteman Is that are retired, these are the Minutemans that have the most improved accuracy, where those are being stored at, whether it's above ground or underground storage, that's really serious. We do not have one single long-term high level radioactive waste storage facility in this country or in this world because it can't be done. And that needs to be considered.

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Thank you.

COL. SMITH: Thank you, ma'am.

COL. WALSH: Let me answer a few of the issues that you

raised. First of all, the time of the hearings. In response to requests made at the last scoping where we did have the meetings starting earlier, people requested that we have them later so it wouldn't interfere with the dinner hour. We had accomodated them on this particular series of hearings.

With respect to your question regarding the schedule, the schedule was not determined by the Air Force, but was in fact dictated by Congress. Congress dictated that the final environmental impact statement be filed with the Environmental Protection Agency by January the 31st. When the 45-day public comment period was established, it was established such that when the final comments came in on the 28th of November, and we said postmarked, so we do expect them to come in -- some comments to come in a few days later, we need to have adequate amount of time to give them proper consideration and to make any adjustments to the document as is determined fit.

With respect to the availability of the document, I can assure everyone here that it was available throughout the study area on the 14th of October. It was, in fact, filed with the EPA on the 7th. On that same day, we had a press release with most of the media in the study area. We also mailed the documents out on that day to the local libraries and also to the city and county clerks in the study area. So on the 14th of October, when the comment periods began, the document was available.

With respect to the notification of hearings, the notification did go out two weeks prior to the event, and in fact did appear in the Colorado newspapers, including those in Denver.

And with respect to the public hearings in Pine Bluffs, we did in fact have representatives of the governmental officials, including the mayor of that particular community.

In another comment that you made regarding other projects in the area that would be occurring at the same time as the Peacekeeper project, you are correct, they should in fact be considered because they are competitors for identical resources and contribute to the impacts both for immigration, inflation, et cetera. These other projects have in fact been included in the analyses.

With regard to your question pertaining to a premature bust, the project, the analyses that we are doing is for the project that has been proposed or decided upon by the President and approved by the Congress. We in the Air Force cannot anticipate what changes may occur with future Congresses. So, therefore, we can only do an analyses for the project that has now been decided upon.

MS. LIPSEY: Why can't you do it --

COL. WALSH: If there is a change in the project, at that particular time we will make a re-evaluation of the need to redo an analyses to determine whether new or lesser mitigation

measures might be required. At that time, we will make that determination.

Would you like to --

CAPT. McMULLEN: Just one brief comment, Evelyn, regarding your point you made about why aren't we replacing the older Minuteman Is with the MX, and as you may recall, we no longer have any Minuteman Is. The reason why the location or decision was made to locate the missiles here was because these particular silos are deep enough, large enough, to accomodate the Peacekeeper missile. There are others as well that are in the Minuteman III force, but it is only the Minuteman III force that has -- which are 550 in number -- deep enough to accept them. There are 400 that are deep enough to accept them.

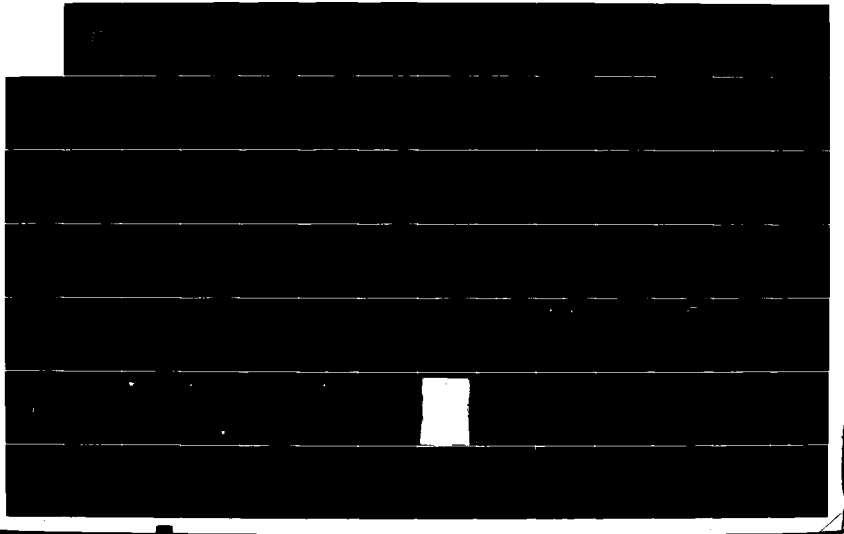
MS. LIPSEY: I know that. I was saying that what you do with the warheads that come out of the Minuteman IIIs in terms of storage. I know they're in warehouses and being watched for aging and all that, but that should be considered because it's highly contaminating.

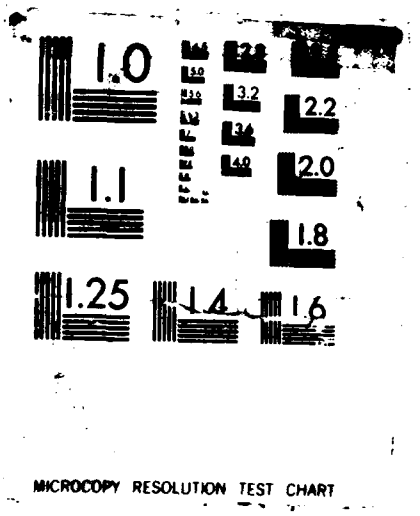
I know that they're -- They need the silos if they're being used, that's not what I asked.

CAPT. McMULLEN: As far as the disposition of the warheads, yes, it will be removed and, of course, handled by the Department of Energy. The disposition of the missiles you already know the answer, so you didn't need an answer

AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA..(U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 6/9

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MICROCOPY RESOLUTION TEST CHART

that, it was a response and we appreciate your comment. Did you need clarification on anything else?

Okay, thanks.

COL. SMITH: The next card I have is that of Marla Painter, representing Western Solidarity.

304 MS. PAINTER: I'm representing Western Solidarity, an eight-state alliance of westerners concerned with the danger of deploying the MX missile. We consider the MX to be not only a problem for the tri-state area, but for the western region and in fact for the entire world.

I work all over the western region and I'm a veteran of the Nevada-Utah struggle against the MX. I've lived with the MX for about four years now, and I know the missile well, and I wish to represent the many people who also know the missile well outside of the tri-state region, who would not only be affected by the deployment of the missile, but who want to be represented here because they have a lot of sympathetic and empathetic feelings with the people of the tri-state area.

One thing that Evelyn did mention about our concerns about public participation is that these hearings are being held at the relative beginning of the comment period or at the middle of it rather than at the end of it, giving people the most time that they could possibly have to make comments on it. Particularly, in view of the fact that it is such a difficult

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document to read for a lay person, and we in fact had raised money to hire a consultant to rewrite the document in plain English for people. But we were not able to get a copy of the document for her until the beginning of this week.

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Another concern I have is that I still have a problem with and we have consulted with two environmental lawyers about this problem, and our consulting with the person who wrote the regulations for the regulations that govern the Environmental Protection Act, and our feeling is that the Air Force is not exempted from doing this impact statement, they're not exempted from doing it correctly, they're not exempted from the law, and the only thing the Jackson Amendment exempted them from was having to do an impact statement on the President's report on comparative basing modes, but that in fact once they got into the system, they have to complete it correctly and within the law.

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In view of that, the President -- even the President of the United States is not allowed to operate outside of the law. And the law states quite clearly that environmental impact statements are not to be written to justify a decision which has already been made. They are to be written to support -- or I'm sorry, they're written in order to try to make a decision, they are the material with which you make a decision. And they are not there to justify a decision which has previously been made. And whether the President says it or not,

he's not exempt from that law, none of us are exempt from the law. And I hope that that gets cleared up soon.

Okay, now, I also have some specific problems with the DEIS which, as a representative of thousands of people in the West, I want to now go over.

This DEIS does not include sufficiently alternatives, in our view. For instance, there has to be covering of the no action alternative -- in this case not to claim the MX. And there would be some consequences to doing that, such as, the long-term economic impact on this region of having those dollars freed up in our economy for economic development for private enterprise. We all know what effect heavy duty military spending is having on our economy, and it goes right down to the regional level and the local level as well.

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Also, we need to understand better the impact of the no action alternative in order to understand fully the impacts of deployment, should it occur. And the -- Any opinion or any view that you express in this document is only as good as the validity of the background from which those views are drawn. So those are some critical points.

Also, having been involved in the MX discussion for a while, for quite a while, for almost four years now, I'm amazed at the way in which the very reasons for deploying this missile in past proposed deployment modes are suddenly no longer viable and that the same reasons that have been put

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forth for not deploying it in this currently proposed mode are now the reasons used for deploying it in this mode. Secretary Weinberger has consistently -- And it's been more than one statement -- has consistently contradicted himself. They've used silo basing as a way to solve a political problem with the military answer, in the words of Reverend Sedorak (phonetic), and I believe that's quite apt.

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So there has to be in any responsible public hearing some discussion of this issue of why it is the Air Force is contradicting itself, and not just the Air Force, but the Department of Defense.

For one moment I'd like to dismiss discussing an antiballistic missile system or a superhardening program which, if you have questions about water for this project, there would be significant impact on agriculture, on water, on livestock in this area on such programs that are going to be instituted to protect this vulnerable missile. But let's assume for a moment that you're not going to leave the -- that you are not going to protect the MX with any of these systems. If you're going to leave the MX in Minuteman silos, they are extremely vulnerable to Soviet first strike, they're sitting ducks. And it's still -- It's still remarkable to me that people aren't more concerned about that, because it is a very different missile than the Minuteman, it's much more dangerous, it's much more spicy a target. And if it is going to be used as a

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nuclear sponge for whatever reason, whether it's to buy the President six to eight minutes to decide what to do, or for whatever reason, I can't think of many more, then why is it that people in the rural west are usually the most expendable in this country? I come from an area where we have people who have suffered terrible tragedies as a result of the testing. And I know a lot of stories that are similar to that one -- I mean, to that situation.

These missiles aren't Minuteman, they are the most dangerous of any weapon thus far developed, because we're talking about 1,000 warheads tied up in 100 targets. It's the scariest, the fastest, and the most accurate and powerful weapon we've ever built to threaten the Soviets. 122

What is the purpose of building these weapons? That's the basic question. Is it to seduce a Soviet attack in -- during some international crisis so that the attack would be concentrated in one part of the nation, or is it to respond to a nuclear attack by sending our MXs over to empty Soviet silos?

Now, I've heard the deterrence argument many times, and I have to ask how many times one has to kill a dead dog. It seems to me that the modernized Tridents, the Trident IIs, which can bust through our targets and the small amount it lacks in the MX accuracy it makes up for in its ability to hide itself in the sea. So why spend all this money to -- Why was all the money spent to modernize the Minuteman III if it's

so old and decrepid and unable to do any of the work you want it to do.

So, you know, it still will kill Soviet citizens, 122
it will still kill a military target, and it seems to me that's one hell of a deterrence.

So my final point is when the DEIS is down in a dam or power plant or anything else, one would never think of writing a DEIS which would not cover the use of that project, yet for some reason the Air Force seems to think that they don't need to talk about the use of this weapon. And that, I think, is the biggest weakness in the DEIS. We're talking about the most destructive project that's ever been built by humankind, and we're told that to cover the impact of this weapon is speculative.

I would submit that this is not true, there are 37
many adequate sources from which to prepare such a study, there's the Congressional Office of Technical Assessment Study on the Effects of Nuclear War, Physicians for Social Responsibility have done a study, and just last weekend, a study was released by a coordinated group of international scientists headed by Dr. Paul Erlich in which he said that the findings were, quote, robust in their consistency. So the people of this region deserve to know what the impact of using these weapons as a concentrated target area or as a portion of a first strike force will be.

So if you're not designing this project as a huge target play nor as a first strike weapon, then you must address the associated project, the superhardening antiballistic missile system, and if you're using this report to justify 35
building MX, which you do continuously, then you have to talk about the Minuteman system.

I know you don't know what the final proposal will be, but you need to talk about the alternative proposals, because that's part of the whole Scowcroft package.

And I want to remind everybody right here that the MX battle is not over, we've only funded 21 missiles, we don't have deployment money, as I understand. We have many Congress people who are supporting this missile very conditionally. We 118
have six -- or maybe not six, we have candidates from the other party, however many are left, none of whom support the MX, and even though it's not the Air Force's problem, it is going to be the problem of the people in this region who have to deal with that bust economy.

Thank you.

COL. SMITH: Thank you very much, ma'am.

The next card that I have is that of Richard Campbell of Torrington. Mr. Campbell.

342 DR. CAMPBELL: Okay. I have three questions and hopefully, they're short for you, no statements.

One thing that I was worried about is that I've done 1367

or been involved with impact studies before when I was in biology, and I looked through your really very complete index on who you're using for your professional references. And what I have here is that you have your prospectives in grassland ecology man comes from Stanford, was trained there; you have your seminar or senior wildlife biologist, he's from California; your fish and wildlife biologist is from Texas; your environmental team leader has four years experience and comes from CSU. Your biological resource manager comes from San Diego; and Van Lowe, who is extremely well respected and did a lot of his training in Pueblo, Colorado, really knows most of his information from New Mexico. 1367

And I was wanting to know that -- What I was taught, anyway, in school is that when you're doing an environmental impact statement, you have to have somebody that knows and did his training and all of his studies solely in the ecosystem that you are going to be doing your project in. So I guess one question is, you don't need to answer this tonight either, I just feel that I'd like to see the -- When the final impact statement comes out, I want to see somebody that did all their study on the prairie in a semi-arid area, and what impact all of the digging and cables is going to be to this area, because this is a very strange area. I can't figure out why we have farmers in Goshen County or anything, because the land -- I mean it's just a very, very different area.

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And I don't see anybody here from Laramie, I see you use a lot of different, you know, you use the Game & Fish, you use people like that, but you don't have anybody that's been trained in ecology from Wyoming, at least as far as I can tell. That's question number one. 1367

Number two is I happen to be a local physician here, I kind of need to know what kind of injuries can we be expecting. When you're doing construction, anything can happen, I know that. But are there going to be chemicals that I'm not really used to? Are there going to be a possibility of burns or radiation exposure? Do I need to brush up on that kind of -- Assuming something is going to -- You're talking about civil defense people have been notified, I might have missed that, I thought someone said they'd been notified. We're the doctors, we haven't been notified. I know there's another doctor here, and I don't think either one of us have been notified about what we could expect as far as what kind of construction are we talking about. 158

I kind of like to plan ahead, and if our emergency room can expect five people in that emergency room at one time, all with pretty serious injuries, and if I've got to deal with the Air Force -- I don't know how to salute, I have a hard time with you guys, and if you're going to come into my emergency room and start bossing me around, you're going to be read a riot act that you don't know.

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And so I need to know how we're going to cooperate. Are you going to be sending doctors up that don't have staff privileges? Are you going to be yanking people out of Goshen County, taking them down to Cheyenne without first stabilizing them? I'd like to know who's going to approach Goshen County doctors, because we need to know that kind of thing. 158

And I'd also like to know what's the worst accident that could happen. We've kind of beat around the bush, and I wish somebody would comment on it. What's the worst thing that could happen. 163

Okay, so then, third --

MR. KINNEY: An honest answer to that would be tremendous.

DR. CAMPBELL: The next thing I want to know, and this makes the statement kind of innovative, is that if the impact statement says that putting this system into our area would be extremely expensive, extremely wasteful, and extremely dangerous, does that stop the MX? Because I know that an entire dam project would stop for snail darter, I know that if an impact statement comes up and that the impact statement goes against MX, does this in fact stop MX? 4

And the final thing, I guess, is kind of a statement. It'd be kind of nice if the people that make statements had to wait, especially people that are lobbying that don't live here in our little town, could wait and make their statements till -- 16

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'cause a lot of mothers had to go home, they had to eat, had to feed kids, and if you could make it so there's a question and then a statement time, and I think that the people that are getting paid to make statements should wait until the mother that really has the one question that maybe you could answer in a hurry has her due process. 16

Thank you very much.

COL. SMITH: Any responses from the panel?

DR. KRAMER: I'm not sure you wanted an answer right now relative to the professional team.

DR. CAMPBELL: Just like to see proof that somebody that really knows what they're talking about, undisputed as one of the main contributors to that final impact statement.

DR. KRAMER: Well, I would like to at least make a small statement or response. And I would hope you, as you have demonstrated by your background and training, are aware that ecology is one of many fields in the biological world, in particular, that tends to be a very broad field, and you don't have to have been trained at a particular university and a particular agriculture or scientific program in a given state to be knowledgeable about the existing conditions and ecosystems in an adjoining state or halfway across the country. You can be as knowledgeable of those conditions without having been born and bred and educated in that spot. And I would hope you could appreciate that as a scientist.

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COL. HICKMAN: Let me speak to the issue, Justice. We've had considerable discussion about accidents, and I don't want to repeat that. There are no hazardous chemicals that were -- we're talking about using, of course, there -- The propellants -- Yeah, for the construction. Now, the missile itself certainly contains propellants and the nuclear materials, those have very stringent handling and the probabilities of accidents where that is dispersed is extremely low.

The most likely type of injury will be during the construction where individuals fall, objects fall on people, or things like that, bodily injury. That's what we would expect.

DR. CAMPBELL: Would you be using our local -- You're not going to plan on flying some helicopter out to the scene, are you? I mean, I just want to know what's the protocol if someone gets hurt?

COL. HICKMAN: We will certainly -- We will -- The detailed plans in this particular area have not been made, and certainly before we begin construction, we will make those plans and make contact with appropriate facilities that we would want to help support us.

COL. WALSH: I would like to answer your last question pertaining to how the statement is used. Basically, the responsibility of the prepared statement or proponent action is to -- The National Environmental Quality Act requires us to make sure

that the decision maker knows the consequences of his actions. In other words, what are the physical environmental effects of the action.

In this particular case, we -- Doing this particular analyses, we will be able to determine what are the fiscal -- physical, other effects on the communities. And this will be the bases for determining the appropriate mitigation to reduce these adverse impacts.

MR. HICKMAN: I would like to just make one comment -- Excuse me -- one comment with respect to the assessment of local facilities for emergency purposes. We did, as part of the Wyoming-Nebraska socioeconomic study, an evaluation of medical facilities and personnel within each of the six counties in which the Peacekeeper project has been proposed.

We did an assessment here within this county, and specifically with the community hospital here, with the available emergency facilities and staffing at that facility. Our assessment at this point was primarily within the socioeconomic study to provide a description of what would be available. And at this point, final decisions with respect to using those facilities by the Air Force will be forthcoming once a full plan construction is completed.

COL. SMITH: The next card I have is to call again on Mr. Verle P-u-n-k-e. I don't know the pronunciation, sir.

390 MR. PUNKE: I've got a couple of comments I would like

to make.

COL. SMITH: Sir, could you come down to the microphone, please.

MR. PUNKE: I would like to reply to some of the comments that have been made by the different panel members. The last one that was made was in relationship to the people doing the impact study, and I think it is really a relevant question to address the expertise of the people making the ecological studies and have them be from the area.

I am a scientist, an ecologist, if you may. I had my training in Kansas and came to Wyoming and know the difficulty of changing regions. I have been trying to study just one small area in Laramie Peak, one small area on the ecology wildflowers up there, it's not an easy task, I've spent eight years at it. It's a very difficult task to do that, so I think that's a valid question. 1367

Number two, about three years ago, I went down to a civil defense meeting here to be trained on radiation information. The training -- I can't remember if it was two hours or three hours -- but the people that were doing the training we were given a big book to go through, and we're supposed to learn about this information. But all we had to do was study the answers to the test to be trained. And if you want those people to help us in Goshen County, that type of training will not do it. We've got to be much better prepared than that. 155

And it's a serious enough issue that I was really discouraged with that type of training for people. I'm capable of being trained in a better way. So the civil defense isn't the answer, from my perspective. Now, maybe in some other areas, but not radiation. I'm not trying to cut down our civil defense program in Goshen County, but in terms of radiation, I think we got a serious problem in terms of training people. I'm not sure that the people from Cheyenne doing the training even knew the difference between beta, alpha and gamma radiation. But they had the answers to the test, gave us the answers to the test, and we passed the test. It's pretty easy to pass the test with the answers. 155

Number two -- Or number three, I should say, I read an article recently in the Casper newspaper and it said if there was an earthquake, I think according to Air Force officials, they made a statement that some plutonium could be released to the atmosphere. And I'd like to check that statement out. Is that true, if there was an accident, some plutonium could be released in the atmosphere? There's no chance of that at all, is that correct or incorrect? 168

CAPT. McMULLEN: The answer to your question is: I don't know who made the statement, okay, number one. And number two, the plutonium cannot be vaporized.

MR. PUNKE: It doesn't have to be vaporized to radiate.

CAPT. McMULLEN: The protective shielding and mechanisms

around the plutonium, the new high or insensitive high explosive materials that are used take greater measure, go to greater lengths in accounting for the possibility of a radiation or plutonium problem, leakage, in other words.

You know, I don't know how specific you want me to be in terms of the question, but that statement was not made, it did not come from the Air Force.

MR. PUNKE: It could not come into the atmosphere, that's an inappropriate statement for the newspaper to make; is that true?

CAPT. McMULLEN: If the newspaper made the statement that the Air Force responded that the plutonium could come into the atmosphere, we did not make that statement.

MR. PUNKE: Could I just ask one question. How much plutonium is on a warhead? How much plutonium is on a warhead, is that classified information?

CAPT. McMULLEN: Yes, it is classified information.

MR. PUNKE: Then I have one question I'd like to ask Col. Smith, if I may. On the program, you allow an hour for government officials' comments or statements. Now, did we just, by some reason, did we pass that over, or did they not have comments?

COL. SMITH: We simply had no government officials that filled out a card tonight, and other meetings we have had, and tonight there were not, so we went straight to the break.

MR. FUNKE: I find -- I should be addressing those people because it's incredible. It's incredible. You know, we are so alone, the people that care about this issue, we are so alone. It's so depressing to care, I can't even live you my concerns.

How can we -- I mean, we get together and tried to make this statement that Jim read, and who in the hell cares about us, from our elected government officials? I mean, they should be doing this, they should be doing it from the federal level. We call, we call the people in Washington, and they're justifying the MX, not trying to look out and ask what safety factors and environmental facts we need to be concerned about.

Our state representatives, our city government, I'm appalled and sad.

COL. SMITH: Thank you very much, sir.

That's the last of the cards I have filled out.

COL. WALSH: I would like to respond to some of the points that the gentleman brought up. We appreciate your comments on the civil defense and we will note them, take some action to respond to that.

With regard to your other statement about the use of local companies, local persons who are more familiar with the environment around here, we certainly do appreciate that comment. And we have, in fact, hired in consulting capacities a considerable number of local companies to help us in this analyses.

Just to give you an idea of some of the companies that have been involved, we have such as aquatic research, ERW, Incorporated, Western Research, University of Wyoming, Biotic Research and Consulting, and Banner Associates. We also have hired other private individuals as consultants to support this analyses so that we definitely wouldn't lose the [illegible]

We do appreciate the comments, and I believe we have responded to that. Thank you.

CAPT. McMULLEN: One further comment for a [illegible] the record, I think there might have been a misunderstanding on my part in terms that I was looking into the Casper Star article and whether or not the Air Force is quoted. And I was not knowledgeable that anyone, at least I, as the policy representative, did not make a quote to the Casper Star. Now if he was referring to the draft environmental impact statement and what we said about it, the plutonium issue -- I'm sorry -- then let me just read so that's it's [illegible] record.

And it's on page [illegible] you want to [illegible] the [illegible], it states [illegible] the [illegible] the life of the plutonium and what could happen. Just for a "If through some abnormal event an explosion component of one of the weapons did actually detonate, consequences would be restricted to air blasts, fragments, and possible release of plutonium particles into the air. It is extremely unlikely

that plutonium could ever be aerosolized by the heat of an explosion, and then subsequently carried to surrounding areas."

If you want to read further on that particular subject, once again, page F31 of the DEIS.

COL. SMITH: Any other comments from the panel?

Apparently not. I have no other cards. We'll take questions from the floor. We have a gentleman over here who has not spoken earlier. If you could give your name, if you'd like to, sir.

UNIDENTIFIED SPEAKER: Well, I just wanted to ask about the uranium, what's it going to do if it explodes?

CAPT. McMULLEN: The answer to your question is: There is no uranium in the warhead, it's plutonium.

COL. SMITH: All right. And Doctor?

DR. CAMPBELL: Did you answer my question or what's the worst accident we can anticipate having? Is the worst accident a blast? I mean, is that probably the worst thing that we could anticipate?

I might have missed it.

COL. FICKMAN: We may not have, because I talked about injuries, construction injuries, and that is the most likely type that you would have.

I guess an accident -- accidental detonation of one of the motors would probably be the worst that you could expect, although you could go on and talk about nuclear detonations,

but the possibility of that is extremely remote.

DR. CAMPBELL: So we're just looking at somebody [illegible] was in that [illegible]

COL. FICKMAN: Yes.

COL. SMITH: Yes, sir. Question in the rear. I'm [illegible]

MR. FINCH: [illegible] training to the Scowcroft report, the Commission's report basing a nuclear submarine rather than basing these -- and I would like to hear why this would not be a better [illegible] basing -- one feeling I get is interservice rivalry is being part of the problem. The other is cost. Mr. Miller says it's too large. But my response to that would be because of its size, launching it from this point, which supposedly is [illegible] North Pole, if it was in a nuclear submarine, the flight time would be much less, would be much more [illegible] be as accurate as what you're professing it to be, and I would like to hear why, if the Air Force decides they need a missile of this magnitude, land based rather than at sea, with the Scowcraft or Scowcroft Commission's report that the submarines are much, much more survivable, I find

CAPT. McMULLEN: First of all, the Air Force did not decide. Second of all, I did, as we visited over the phone previously, I made the obvious answer that the missile was too large to fit into submarines, but definitely agreed with you that the submarine is much survival -- a survivable basing mode

However, we have an accuracy problem.

One of the primary considerations when the Scowcroft Commission reviewed our entire strategic forces, our Triad forces, our submarines, our bombers, our land based missiles, they looked at the prompt counter-military capability of all three systems.

The system that gives us that hard target from counter-military capability is a land based missile system. Because the Soviet Union has superhardened their high value assets, our systems currently deployed today are virtually ineffective against those high value assets.

In order for deterrence to work, we need to have the capability to hold it hostage, those high value assets, to reduce the risk of war. The -- What I'm driving at, the land based missile system, the MX, which is twice as accurate as our existing Minuteman system, cannot achieve that accuracy when it's deployed in a submarine, and that's really the heart of your question.

MR. KINNEY: I would like to hear some naval response to that. I think that at least one of the Navy admirals would be sure there will be a lot of admirals that would dispute the issue with you.

CAPT. McMULLEN: That response -- The response to that is it came out of the technical assessment report that was part of the report that was sure and to the President be the

part of the President's report, the Scowcroft Commission or the summary that you probably have in your hand is indeed just that, a summary of their entire review of all the basing alternatives, which included submarine basing.

Oh, I might add, including the input, the Navy came before the Scowcroft Commission. I think we discussed that over the phone.

MR. KINNEY: I have not seen any information as to that yet. I was mailed by Senator Wallop -- who I do not see a representative here -- It's a report of the President's Commission on Strategic Forces --

CAPT. McMULLEN: Exactly, that's the --

MR. KINNEY: There has been other testimony, to my understanding, after talking to Senator Hart's office, from Air Force and Naval personnel. Where is that? Is it being buried by some bureaucracy?

CAPT. McMULLEN: Since most of the analytical work that was done by the Scowcroft Commission and part of the testimony, especially in terms of accuracy, and although there's very few things that we cannot discuss, one of the things that we are prohibited from discussing is the levels of accuracy, the precise measurements. And those are classified terms, so that they really document that, they have to be in classified reports, and that is documented.

The Navy responds and the Air Force responds before

the Scowcroft Commission in terms of what level of accuracy you offer us against those high-valued superhardened structured assets that the Soviet Union has for retaliation and the answer came out.

MR. KINNEY: Would you get back to this -- memory, the Navy's response to that.

CAPT. McMULLEN: I just commented that the response is classified.

MR. KINNEY: Not according to Senator Hart's office.

CAPT. McMULLEN: If there is some literature available on it in a nonclassified form, I'll research it out for you and be happy to, as the liason officer of this area, be happy to provide that for you. Does that satisfy you, Mr. Kinney? Okay.

MR. KINNEY: My other question, we heard the comment made about the moving in of mobile homes to south Cheyenne, about the mayor of Cheyenne not approving mobile homes being moved into that area. What is your response to that?

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COL. WALSH: The draft environmental impact statement is not a blueprint of what's going to happen in the future. It is a projection of what would happen if no other mitigating actions are taken. Naturally, we expect and we have proposed mitigation action is to be taken by the local governmental entities. They have in fact taken some already, whether we do it -- stated it in response to or independent of this report, they have in fact imposed a moritorium on sewer hookups in the

South Cheyenne area.

What we will do now is in the new document, the final environmental impact statement, we will take into account each new constraint in developing our projection.

COL. SMITH: Ms. Painter, I think, had a question.

MS. PAINTER: I just quickly want to quote the reg that governs the National Environmental Policy of 1969. It's Section 1502.2d, and it reads: Environmental impact statements shall serve as a means of assessing the environmental impact of proposed agency actions rather than justifying decisions already made.

And I'd also like to refer people to a book written by a man who helped design the submarine system, and he has the opinion that the accuracies between the two missile systems is -- the difference in the accuracies is very low. Another opinion for you to consider.

COL. SMITH: Thank you, ma'am.

Mayor Bonne?

MAYOR BONNE: What I want to say in defense of public officials, that the statement was made here a minute ago, I think a lot of people don't realize how much the Air Force has worked with the County Commissioners and the town and other people in the last six months providing us with information and doing this in their own way and their own time and coming in.

I think you need to be commended for it, and I told

both Senator Wallop and Senator Simpson's aides tonight to please convey that message to the two senators. I thought the Air Force had overwhelmed the government, giving us all this information, which a lot of these people here wouldn't know anything about. But I do want to defend them.

I know you did meet with the town officials the other day, some are employees, Director of Public Works, you met with me, you met with the County Commissioners, which we didn't attend because you'd already been to city hall.

So I just want to say thank you, and also just let these people know that you are doing your work with the city officials, the city officials and county officials are interested.

Thank you.

CAPT. McMULLEN: Thank you.

COL. SMITH: Thank you, sir.

Any other questions or comments?

324 UNIDENTIFIED SPEAKER: I wanted to ask: Is this a first strike missile, or is this is a defense weapon? 116

CAPT McMULLEN: The answer to the first question, is this a first strike weapon, is no. It is not the policy of the United States to develop a first strike strategy. The answer to your second question, yes, it is a defense weapon in the sense that it will enhance our security and provide that extra ingredient of deterrence as part of the Trident strategic forces

COL. SMITH: Any other comments or questions.

MR. FULLER: I'd like -- I don't know, this might be a inaudible question, but I would like a response from each and every one of the members of the panel, the answer to the question is either with a yes or no. Would you actually push the button?

COL. SMITH: Well, I think the question is beyond the scope of the hearing, so we'll not call upon the panel members to respond to that.

Any other questions?

(Brief pause.

COL. SMITH: Or comments?

(Brief pause.

COL. SMITH: Apparently not. Ladies and gentlemen, we thank you very much for your participation at the hearing, and we certainly appreciate your comments, questions that you presented to us tonight.

Once again, I remind you that written comments may be sent to the address on the handout that was available at the door. They should be postmarked by the 2nd of November. They also may be dropped in the box at the desk at the door.

We thank you very much, and good evening.

(Proceedings concluded.

* * * * *

REPORTER'S CERTIFICATE

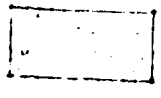
State of Wyoming)
) SS
County of Laramie)

I, Lisa Linden, Registered Professional Reporter and Notary Public in and for the State of Wyoming, hereby certify that I did at the time, date, and place as set forth, report the proceedings had before Colonel Allan Smith, The Hearing Officer, and the panel, in stenotype; that the foregoing pages, numbered 1-89, inclusive, constitute a true, correct, and complete transcript of my stenographic notes, as reduced to typewritten form under my direction.

I further certify that I am not agent, attorney, or counsel for any of the parties hereto, nor am I interested in the outcome thereof.

Dated this 5th day of November, 1981.

LISA LINDEN, RPR



DEPARTMENT OF THE AIR FORCE
PEACEKEEPER IN MINUTEMAN SILOS
ENVIRONMENTAL IMPACT STATEMENT PROCESS
PUBLIC HEARING

TRANSCRIPT OF HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties in interest, this matter came on regularly for hearing on the 4th day of November, 1981, at the hour of 3:04 p.m., in the Banner County School Gym, Harrisburg, Nebraska, Colonel Alan Smith presiding.

Also present were Lieutenant Colonel Peter Walsh, Colonel Warren Hickman, Lieutenant Colonel Rees Padfield, Major Dave Taggart, Captain Mike McMullin, Mr. Fred Hickman and Dr. Richard Kramer.

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PROCEEDINGS

(Hearing proceedings commenced 3:04 p.m., November 4, 1983.)

COLONEL SMITH: Good afternoon. Welcome to the sixth of seven hearings in Wyoming and Nebraska on the Draft Environmental Impact Statement for the Peacekeeper and Minuteman.

I'm Colonel Alan Smith, an Air Force trial judge. I'm an appointed hearing officer for a series of hearings. My role is simply to conduct the hearing. I have not been involved in the development of the Peacekeeper Project, and I will not be making any recommendations or decisions concerning it.

First on the agenda this afternoon will be an explanation of the Peacekeeper Project and the draft statement by Lieutenant Peter Walsh, our hearing team chief. Following his presentation, statements and comments from government officials will be received. We will then have a short break.

After the break we will accept questions, comments, statements from individuals and representatives of organizations. We ask the speakers limit their statements, comments, questions

to approximately five minutes. Questions will be answered by our team of specialists, experts who are knowledgeable regarding the project, the hearing scheduled to conclude at 6 p.m. this afternoon.

To provide the greatest opportunity for all of those who wish to present comments or questions, we request that you fill out one of the cards available at the registration desk in the lobby. Speakers will be recognized from the floor only if time permits and after all of those registering to speak have the opportunity to do so.

If time does not permit you the opportunity to speak today, you certainly may submit written comments or statements. This may be done by dropping them in the box at the registration table in the lobby or by mailing them to the address on the hearing handout. They must be postmarked on or before 28 November 1983. The address will also be on the slide during the course of the hearing.

We have a court reporter available here this afternoon, and a verbatim transcript of the hearing will be made. We also have a video tape of the proceedings being made as a backup to the transcript to ensure that the record is accurate and complete.

We have Captain Pat Melaney somewhere in the hall, and if the press has any special questions or any questions regarding the proceedings, if you could please contact Captain Melaney.

We're now ready to have the briefing on the Peacekeeper Project by Lieutenant Colonel Walsh, and I present to you now our hearing team chief, Lieutenant Colonel Peter Walsh.

LIEUTENANT COLONEL WALSH: Good afternoon, ladies and gentlemen. I am Lieutentant Colonel Peter Walsh, Director of the Environmental Planning Division for the Air Force, Regional Civil Engineer at Norton Air Force Base.

In this position, I am responsible for the preparation of the Environmental Impact Statement for the Peacekeeper in Minuteman Silos Project. Today I intend to summarize the major findings of the Draft Environmental Impact Statement issued on October the 14th for the project.

However, before reviewing the findings, I shall provide the background and context for the statement. Specifically, I shall cover the following subjects: First, I shall review events leading to the Presidental decision to deploy the Peacekeeper in Minuteman silos;

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Second, I shall briefly describe the project: Third, I shall discuss the scope of the Environmental Impact Statement. Next, I shall describe the process and methods used in preparation of the statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final Environmental Impact Statement.

The same briefing has and will be presented at all public hearings so everyone will receive the same information.

In accordance with the Presidential decision of April the 19th, 1983, the Air Force plans to deploy the Peacekeeper Missile System within the 90th Strategic Missile Wing at F.E. Warren Air Force Base near Cheyenne, Wyoming.

In making this decision, the President was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been [illegible] by the President on January the 3rd, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

The project described by the president entails replacement of 100 of the existing Minuteman III Missiles with 100 Peacekeeper Missiles in the

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400th and 319th Stategic Missile Squadrons located near Cheyenne.

In order to implement this decision, the following actions are required: Modification of existing facilities and construction of new facilities at F.E. Warren Air Force Base: modification of 100 missile launch and 10 launch control facilities in the aforementioned squadrons: Installation of five additional buried cable systems connecting the two squadrons and upgrading the existing deployment area road network.

The project will commence in early 1984, soon after the final Environmental Impact Statement is filed. Initial operational capability, defined as the first ten operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989.

Operations of the Peacekeeper will be similar to the Minuteman System. The major differences are in the transport and emplacement of the missile. The Minuteman stages are transported fully assembled and emplaced in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle and emplaced in the silo by another vehicle.

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Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman System.

Similarly, the Peacekeeper System will be as safe, if not safer, than the Minuteman System. An accidental burning or detonation of a Minuteman has never occurred during any of its past 19 years of deployment. The Peacekeeper System has benefited from this field experience as well as improvements in technology.

Deployment and use of insensitive high explosives in the Peacekeeper reentry system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command.

The system is designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than 1 in 10 trillion.

Given the Presidential decision and its implementation requirements, the Air Force prepared

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the Draft Environmental Impact Statement in accordance with the Council on Environmental Quality regulations. The statement assesses the impacts of the deployment and peacetime operation of the system, alternative project elements and the no-action alternative of retaining the existing Minuteman III Missiles.

This statement does not cover the analyses of alternative basing modes nor deployment location for the Peacekeeper Missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the "Jackson Amendment" exempted the President's report from the requirements of the National Environmental Policy Act.

Likewise, an analyses of other basing modes such as super-hardening of protective structures, deep basing and ballistic missile defense are not included in this statement. They are excluded because first, they were not part of the President's decision: second, the Air Force does not intend to propose any of them in the reasonable foreseeable future: and third, the Peacekeeper deployment is not connected to any of these potential systems.

Furthermore, the environmental impacts of nuclear attack are not analysed in the statement

because the effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operation.

Following the President's decision and subsequent approval by Congress, a notice of intent to conduct the environmental impact statement process and the schedule for scoping meetings was published in the Federal Register on June the 13th, 1983. The scoping meetings were held between June the 27th and July the 8th, 1983.

Public meetings were held in Cheyenne, Pine Bluffs, Torrington, and Wheatland, Wyoming and Kimball and Harrisburg, Nebraska. Additional meetings were held with federal agencies in Denver, Colorado and Kansas City, Missouri and with Nebraska state agencies in Lincoln, Nebraska.

The purpose of these meetings was to obtain information for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental resource in a two-step process. Study

areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project.

Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analyzed within both the regions of influence and the areas of concentrated study. Four categories formed the framework for impact analysis. They are area, timing, intensity, and significance. Area is defined as either site, local or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site. And

region is the previously discussed region of influence for each resource.

Timing is defined as either short term or long term. Short term is the period from commencement of work until the system is fully operational. Long term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission.

Intensity is defined as negligible, low, moderate or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during project planning or requires extensive action to mitigate.

Upon completion of the analyses, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages. A set of 13 environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the document was published in the Federal Register on October the

14th. On that date, the document was also available at libraries and federal, state and local agencies within the study area.

In this review, I shall present a description of each resource studied. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing, and intensity of adverse impacts. Major reasons for the impact conclusions will be presented.

Finally, if the impact has been judged to be significant, the rationale for such judgment will be given.

You may follow my presentation by referring to the table on the inside of the handout that was made available to you as you entered the auditorium.

Employment Demand: Employment demand describes the available regional labor force which may be used by the project and the demand for non-local labor which may result in the immigration of workers and their families.

The analysis indicates a short and long-term, beneficial effect on the City of Cheyenne and the region of influence because of increases in employment and income.

During the peak employment years 1986 and

1987, approximately 3,300 persons will be employed as a result of the project. There will be about 1,800 direct and 1,500 indirect jobs. Approximately 1,000 of the 3,300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements will be filled through either immigration or weekly commuting.

When the system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

Housing: Housing includes the existing housing stock and the capability of the private housing industry to respond to changes in housing demand. Local, short and long-term, beneficial effects result from potential increases in sales value and rental income due to increased housing demand in the Cheyenne urban area and the city of Kimball. There is, however, an opposite effect on the consumer, particularly those on fixed income and the first-time home buyers.

The analysis indicates a local, short-term, moderate impact because the demand for mobile homes both in Cheyenne urban area and the city of Kimball exceeds the projected net vacancy rate. Also the

market response would have to exceed the highest historical annual production level.

The analysis further indicates local, long-term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as outmigration occurs during 1986 through 1990.

The local, short-term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level, and the housing industry sales will shift to a larger volume of mobile homes.

Public Finance: Public finance describes the budgets, fiscal resources and obligations of all major governmental entities including school districts and urban service areas.

The analysis indicates a local, short and long-term, beneficial effect because of additional revenue to governmental entities due to increased sales and property taxes and other taxes and fees.

The analysis further indicates local, short-term, moderate impacts because many local governmental entities would face potential fiscal imbalances. This would require either an increase in revenues or a reduction in service-related

expenditures during peak project activity.

The analysis also indicates local, long-term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

Construction Resources: Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, strucutral steel, reinforcing steel and steel rail.

The analysis indicates that regional, short-term, beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analysis further indicates a regional, short-term, low impact resulting from the projects increased demand on regional production capacity of cement, aggregate, ballast, asphalt and roofing.

Social Well-Being: Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions and selected indicators of behaviour.

A local, short-term, beneficial effect is

anticipated due to the improved economy. The analysis indicates local, short-term, moderate impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with immigration of population.

The analysis further indicates that the local, short-term impacts were judged significant because the population subgroups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job seekers, adolescents and fixed-income elderly.

Public Services and Facilities: Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal justice, fire protection, health care, human services, and libraries.

The analysis indicates local, short-term, moderate impacts. These impacts are due to a 7 percent increase over what is projected for the student population without the project in Laramie

County School District Number 1 in the peak year, 1987.

Also contributing to the impacts is the need for additional fire fighters, vehicles and space for the City of Cheyenne Fire Department, the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne and increased demands in health care and human services.

The analysis further indicates local, long-term, moderate impacts are a result of the continued need for additional staffing and classroom space in Laramie County School District Number 1. These impacts are also the result of the need for additional law enforcement in the City of Cheyenne.

The local, short-term impacts were judged significant because of the overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control and the potential for human service needs that are unsatisfied.

Utilities: Utilities describes water treatment and distribution systems, wastewater systems, solid waste systems, stormwater facilities and telephone services.

The analysis indicates that site, short-term, low impacts are a result of a further over-

loading of an existing sewer downstream of the F.E. Warren Air Force Base sewer and the need for additional on-base telephone equipment.

Local, short-term, low impacts result from the further degradation of the performance of an existing wastewater system in the Cheyenne urban area and Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and stormwater facilitites in the Cheyenne urban area as a result of new land development in the region.

The local, short-term impacts were judged significant because the overloaded operating condition of the wastewater systems in the Cheyenne urban area and in Torrington will be aggravated.

Energy Resources: Energy resources include the supply and distribution systems for electrical power, natural gas, petroleum fuel and coal. The analysis indicates local, short-term, moderate impacts as a result of the need to expand the capacity of a local electrical substation serving F.E. Warren Air Force Base by about 40 percent.

Local, long-term, low impacts result from increased energy demands. The analysis also indicates regional, short-term, low impacts as a

result of the depletion of non-renewable energy resources from the construction phase of the project.

Regional, long-term, low impacts are a result of the depletion of non-renewable energy resources by Peacekeeper operating personnel.

Transportation: Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transportation planning, design and operation of roads, railroads, aviation facilities, public transit, and pedestrian and bicycle facilities.

A long-term, beneficial effect is anticipated due to the improvements to roads and bridges at the site, local and regionale levels.

The analysis indicates site, short-term, low impacts as a result of the construction activities on and near roads in the deployment area. Local, short-term, moderate impacts are indicated as a result of the reductions in the level of service at 13 of 26 impacted intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F.E. Warren Air Force Base Randall Avenue gate due to the influx of construction workers and materials on to the base.

The analysis further indicates regional, short-term, low impact as a result of existing capacity constraints and increased demand at Cheyenne airport.

The site, short-term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternate travel routes.

Local, short-term, moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land Use: Land use comprises both urban land uses in developed communities where population immigration is expected and rural land uses in the deployment area where direct impacts from private development would occur.

A local, long-term, beneficial effect may occur from the infill of vacant areas within the city boundaries of Cheyenne and Kimball.

The analysis indicates site, short-term, low impacts are a result of the temporary

interruption of agricultural land use during cable trenching. The site, long-term, low impacts are a result of restriction on residential land use within explosive safety zones.

The analysis also indicates local, short-term, low impacts are a result of the under-utilization of land developed to support mobile homes beginning in 1987 as outmigration begins.

Local, long-term, low impacts are a result of the continuing underutilization of land developed to support mobile homes.

Recreation: Recreation includes regional, resource based recreation which is related to federal, state and other lands offering rural outdoor recreation opportunities and local user-based recreation which is related to municipal and county-owned parks and facilities within urbanized areas.

The analysis indicates local, short-term, moderate impacts as a result of increased demand for parkland, facilities and staffing. The analysis also indicates local, long-term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation system requiring additional expenditures for operations and maintenance.

The analysis further indicates regional, short-term, moderate impacts primarily as a result of increased demand at Medicine Bow National Forest, and Curt Gowdy, Glendo, and Guernsey State Parks. These regional impacts become low in the long term due to reduction in the number of users when out-migration occurs.

Local, short-term, moderate impacts were judged significant because of the need to seek funding outside of the normal budgetary process in order to provide additional local parklands and recreational facilities.

Regional, short-term, moderate impacts were judged significant because the additional use of regional recreation facilities will exacerbate an existing overcrowded situation thereby attributing to a noticeable decline in the perceived quality of the recreationl experience.

Cultural Resources: Cultural resources include four separate elements: Paleontological, prehistoric, historic and American Indian cultural resources.

The analysis indicates site, short-term, moderate impacts as a result of ground disturbing activities associated with Peacekeeper deployment

that may affect historic and prehistoric sites.

The analysis also indicates site, long-term, low impacts as a result of the use of buildings at F.E. Warren Air Force Base currently listed on the National Register of Historic Places.

Visual Resources: Visual resources include scenic resources and the visual environment as well as an evaluation of the visual quality of the region.

The analysis indicates site, short-term, low impacts due to clearing of vegetation and grading activities during construction.

Water Resources: Water resources includes ground water hydrology and quality, surface water hydrology and quality, water use and demand and constraints on water use.

The analysis indicates site, short-term, low impacts at F.E. Warren Air Force Base, launch facilities and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hydrology.

Site, long-term, low impacts are a result of permanent changes to stormwater runoff characteristics. The analysis also indicates local, short-term, moderate impacts because induced water demand exceeds the projected capacity of the

existing delivery system for the Cheyenne urban area.

Local, long-term, low impacts are predicted because of increased water demands, increased surface runoff, and increased erosion and sedimentation in the Cheyenne urban area.

Regional, short-term, low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development. The local, short-term, moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

Biological Resources: Biological resources include vegetation, wildlife, fisheries and unique and sensitive habitats. The analysis indicates site, short-term, moderate impacts as a result of the potential immediate disruption by construction or modification activities of riparian vegetation and wildlife habitats.

The analysis also indicates site, long-term, moderate impacts as a result of construction activities that may potentially disrupt trees and shrubs in riparian and wetland habitats that have long recovery periods.

The analysis further indicates that there are regional, short-term, moderate impacts. These

are the result of general recreational pressures, poaching, dog kills and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park.

The regional, long-term, low impacts are a result of the random shooting of the Swainson's Hawk and other birds of prey.

The site, short-term, moderate impacts were judged significant because of the limited extent of riparian and wetland habitats. The site, long-term, moderate impacts were judged significant because of the long recovery periods of the riparian vegetation.

Regional, short-term, moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased human activity on big game in areas of concentrated recreation pressures.

Regional, long-term, low impacts were judged significant because of concerns over declining populations of some species of birds of prey.

Threatened and Endangered Species: Threatened and endangered species include plants, wildlife and aquatic species which are protected by federal law as threatened or endangered. Also

included in this category are state-protected rare, threatened or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because of special state concern.

The analysis indicates site, short-term, high impacts as a result of the disturbance of the habitat of the Colorado Butterfly Plant and the Woolly Milkvetch. Site, high impacts will continue in the long term as the result of the loss of habitat for the Colorado Butterfly Plant.

The analysis further indicates regional, short-term, low impacts as a result of the potential for random shooting of the Bald Eagle and accidental catching of the Greenback Cutthroat Trout. Regional, long-term, low impacts are a result of the continuing potential for random shootings of the Bald Eagle.

All of these impacts were judged significant because the Bald Eagle and Greenback Cutthroat Trout are federally listed endangered species. Also the Colorado Butterfly Plant is categorized as a Category I species by U.S. Fish and Wildlife Service, and the Woolly Milkvetch is listed as rare by the Wyoming Natural Heritage Program.

Geologic Resources: Geologic resources include geological hazards, energy and mineral resources including aggregate and soil resources.

The analysis indicates site, short-term, low impacts as a result of the potential for soil erosion during construction activities. The analysis further indicates local, short-term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading.

The analysis also indicates local, long-term, low impacts resulting from the need for aggregate resources for road maintenance.

Noise: Noise analysis includes vehicular, air and railroad transportation and construction activity. The analysis indicates that the impacts will be negligible.

Air Quality: Air quality describes the effects of project construction, operation and related transportation activities upon future air quality.

The analysis indicates local, short-term, low impacts. These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne

and because of fugitive dust impacts as a result of construction activities.

As previously discussed, project alternatives were analyzed. These analysis focused on alternative road configurations, cable routes and staging areas. The analyses have demonstrated that for most of the resource areas the level of impact is either negligible or low and not significant and does not vary within each of the three sets of project element alternatives.

For four resource area transportation, land use, cultural resources and biological resources, there are variations in the level of impact among alternatives. I shall summarize these.

As shown on this screen, three alternative egress routes for transporting the Peacekeeper stages from the base were considered. Alternative R-2 which is the proposed action, is designed to allow all northbound stage transporter travel to exit the base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack Bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Bridge clearance

problems and the egress of the stage transporter at the Central Avenue interchange at the Missile Drive interchange to travel north or south.

Alternative R-3 involves providing stage transporter access to Interstate 80 via Roundtop Road which would require new on/off ramps at Interstate 80. Access to the north would still be via Interstate 25 near the Central Avenue interchange.

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads off base in addition to new on/off ramps at Interstate 80.

This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Roundtop Road may tend to stimulate urban development west of F.E. Warren Air Force Base which would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage

transporter route has the potential for intersecting cultural properties eligible for the National Register of Historic Places.

In addition, all three alternatives have a high and significant impact on the habitat of the Colorado Butterfly Plant because of potential disturbance during the construction phase of the project. This impact was judged significant because of U.S. Fish and Wildlife Service's Category I classification of the plant species.

For the project five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corriders have been identified for environmental analyses.

Three alternatives follow overland routes. Two of these follow easements previously obtained by the Air Force for communications cables. One alternative follows an existing road right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way.

Impacts among the alternative cable paths did not vary appreciably with the exception of land use, cultural resources and biological resources.

The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to documented presence of archaeological sites in the area which the cable will traverse and the high probability that these routes would destroy additional, presently unrecorded sites.

The remaining four routes have been assigned a low or moderate impact based on the lower possibility of encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing critical raptor, riparian or aquatic habitats. Four of the seven alternatives would have moderate impacts while the other three would have low impacts.

The differences are due to the expected frequency of encountering the critical habitats. These impacts were judged significant because of the limited areas of these habitats.

Environmental impacts of the staging area

locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center. The proposed action would have staging areas located on the base and in Cheyenne, Wyoming and Kimball, Nebraska.

An alternative would have temporary support areas only on the base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered d. not vary appreciably with the exception of transportation and cultural resources. Transportation impacts would be low for the proposed action which includes a staging area in Kimball because of the potential of congestion on community roads.

Similarly, impacts on cultural resources would be low for the proposals that include staging areas on the base because of the presence of prehistoric and historic cultural resources.

In conclusion the Draft Environmental Impact Statement projects beneficial effects in employment demand, housing, public finance, construction resources, social well-being,

transportation and land use. It further predicts that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transportation, recreation, water resources, biological resources and threatened and endangered species.

To the extent practicable, the standard practiced that could avoid reviews or eliminate environmental impacts were assumed in the assessment process. Additionally mitigation measures which would be used to review impacts have been identified.

These include requesting funds to existing federal impacted school districts or federal impact aid to Laramie County School District Number 1. The Department of Defense and Wyoming and Nebraska government entities have agreed to enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense which will mitigate adverse impacts resulting from the project.

The statements, comments and questions provided during the public hearings and written comments postmarked by November the 28th, 1983, will be analyzed. After the close of the comment period,

the Air Force will review and evaluate all inputs to determine how they should be responded to and the need for revisions to the analyses contained in the draft statement.

The completion of this work will result in the development of the final Environmental Impact Statement to be released by January the 31st, 1984. The written comments may be committed at the conclusion of this meeting or mailed to the address shown on the screen.

Written comments will receive the same consideration as those received vocally this afternoon. This completes the briefing portion of the hearing. I shall now turn the program back to Colonel Smith.

COLONEL SMITH: Thank you very much Colonel Walsh. We're now ready to introduce the briefing team that will assist Colonel Walsh in responding to the questions, comments that people have this evening.

First I'd like to introduce Colonel Warren Hickman who is Site Activation Task Force Commander at F.E. Warren Air Force Base. Next Lieutenant Colonel Rees Patfield is the Assistant Chief of Requirements of Integration Division of the

Ballistic Missile Office at Norton Air Force Base, California.

Next we have Major Dave Taggart who is the Staff Judge Advocate of the Air Force Regional Civil Engineer at the Norton Air Force Base, California. Next we have Captain Mike McMullin who is the Air Force Headquarters Representative in Cheyenne, Wyoming, Air Force Headquarters Representative for the Peacekeeper Liaison Project.

Next we have Mr. Fred Hickman who is the Human Resources Director for URS-Berger, San Bernardino, California. Finally, Dr. Dick Kramer who is the Natural Resources Director for URS-Berger San Bernardino, California. These gentlemen will assist Colonel Walsh in responding to the questions, comments that you have here this afternoon.

We have one public official who is present here today. We have Mr. Klayton Johnson who is Chairman of the Banner County Board of Commissioners.

Mr. Johnson, if you would like to step down to the microphone, we would appreciate it, and go ahead and make your statement. Welcome, sir. We're very pleased to have you here this afternoon.

151 MR. JOHNSON: Thank you, sir. I'm Klayton Johnson of Banner County, Nebraska. The

Banner County Board of Commissioners has chosen to submit written statement, a copy of which has been deposited in your depository in the school.

I might express my personal opinion that these hearings and Draft Environmental Impact Statements are all moot and void in view of the action of the House of Representatives yesterday. These paraphrase our written statements which we have submitted.

We have chosen to respond only to the part of the statement that we feel pertains to county government in Banner County. In the Environmental Planning Technical Report on transportation, paragraph 4 of 3.5.1.2.1.5 discusses projected traffic volume and road capacity. 1022

We take issue with projected count in the statement that the volumes will be considerably lower than even the estimates. We believe from our experience that with the increasing movement of ordinary every day traffic, it is fair to expect volume will not be less than baseline volumes.

Paragraph 6 of 3.4.1.2.1.5 states, "Under no action, it was assumed that Minuteman T/E routes would continue to be used during baseline years and their physical conditions would remain essentially 1023

unchanged."

We believe that all the Minuteman routes will be used. They will have to withstand the traffic of the baseline years and stand every possibility to considerable deterioration without an expanded maintenance program.

As heretofore stated in these comments, it is our belief from years of experience in this area that while the gravel roads as they exist in Banner County are of the highest quality you could expect, they are not nearly adequate to provide access to Minuteman Complex or later to the MX Complex at all times there may be a need. 1023

And one other short sentence, paragraph 3.5.1.2.4.3, Construction Water Requirements in Deployment Area, the Banner County Board feels that water use will not adversely affect Banner County provided that all the water is not pumped from one well. 1039

And that is the only thing that I will read publicly and again we have submitted written statements. Thank you.

LIEUTENANT COLONEL SMITH: Thank you very much. We surely appreciate it. We have no further public officials that have submitted cards

at this time.

Let's go ahead and take about a ten minute break. We'll return and then take comments and statements from individuals and representatives of organizations. So let's recess for about ten minutes.

(Hearing proceedings recessed 4:00 p.m. and reconvened at 4:15 p.m., November 4, 1983.)

COLONEL SMITH: Ladies and gentlemen, we'll proceed on with the hearing. First I'd like to point out that we have staff representatives from your congressional delegation present in the audience and also representatives of the Governor of the state of Nebraska.

We'll now proceed with the comments, questions and statements from those who filled out the cards in the lobby. We do ask that you try and limit your comments to approximately five minutes as we have quite a few cards, and we'd certainly like to be able to get through them here this afternoon.

The first speaker that I have is Thomas J. Fraser, a Pastor from Mitchell, Nebraska.

PASTOR FRASER: I didn't want to be a

speaker.

COLONEL SMITH: Oh, I'm sorry. I have a card here that's not a speaker. All right. We'll move on to the next card.

I might point out we've arranged for a portable mike, and it will be passed to you. That should make it a little bit easier than trying to climb down from the seats that you're in.

The next speaker is Wayne Josephson, the Pastor of the American Lutheran Church in Lodgepole, Nebraska.

360 PASTOR JOSEPHSON: I'm extremely upset and angry first of all because there has not been enough time to evaluate this rather large and cumbersome document with all its jargon. It was not available in Cheyenne County in the public library. Cheyenne County was not a study area. But that to me shows the narrow sightedness, the prejudice on the part of those who drafted this statement and not realizing the kind of cultural and geographic area of the high plains the Nebraska Panhandle is. 23 24 43

Frankly some of us who live in the Nebraska Panhandle are damn sick and tired of being treated as second-class citizens every time the government does something. Most of my anger is because of the 37

continued violation of my sensibilities and my intelligence to call a weapon of violence and destruction a peacekeeper, to totally ignore the cultural value, morality in an environmental impact issue statement.

What kind of impact these weapons of destruction and violence have on people, on my children, on my grandchildren, to ignore that makes me angry. And I don't understand how anyone in the military can call the effects of war speculative. 37

The destruction of buildings, the death of people are not speculative. It is a reality that anyone in the military should and better know about. How long we have to put up with this kind of attitude and the total ignoring of morality in dealing with defense and foreign policy issues, I don't know.

Our President and our military seem to be capable of totally and blatantly violating the Constitution, the charter of the United Nations, commitments made in foreign policy and in domestic policy and all under the name of defending me. I don't feel defended. I feel violated.

A long time ago when this whole MX issue started, there was to be little or no taking of land. 185

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little or no effect on people. This document states that there will indeed be some land taken, that there are nine families going to be moved and yet that is not seen as a tragedy or a violation or as a weakening of our defense. How can it be?

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Millions upon millions have been rooted out of the land in the last 40 years. And yet we have the audacity to think that these missiles will preserve and protect our land, a land without people, a nation without a soul.

COLONEL SMITH: Thank you, sir.

The next card that I have is that of Byrle Hopkins speaking as an individual. I can't tell whether it's marked to give comments or not.

MR. HOPKINS: I don't believe I have a comment to make at this time. Thank you.

COLONEL SMITH: All right. Thank you, sir. Thank you very much. The next card that I have is that of Donna Olsen from Harrisburg, Nebraska.

385 MRS. OLSEN: I have a question.

COLONEL SMITH: Yes, ma'am.

MRS. OLSEN: We were told earlier that there would be no taking of land, farms, water or anything. Now you have extended the radius. Can

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you give us a guarantee that they'll be no more extension to this, or in six months time will it be a quarter of a mile wide or further on?

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CAPTAIN MCMULLIN: With respect to your question about that you had been told that there would be no land taken or little land, we are still, of course, with respect to the safety zone validating the requirements of increasing the safety zone to what is currently around the Minuteman silo. That is 1,200 feet to our proposed 1,750 feet.

We have -- that decision has not yet been made. We will validate that through a testing and analysis program which will be completed in the spring of 1984. Even after that testing analysis is completed, and let's say for example it does warrant an increase to the 1,750 foot mark, the landowner, in this case the nine affected landowners that we have identified, have the option to seek exemptions from the safety rules; rather than be disrupted and move off their land, to stay right there where they developed their routes and continue their farm operation.

With respect to the water issue, I'm not sure if you have a specific question that we could address on that. We'd be happy to answer it but I'm

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not sure exactly what your question is. Is it in terms of using water versus not using or --

MRS. OLSEN: How much water will you need to build the roads and the missile and the whole works?

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CAPTAIN MCMULLIN: Major Dave Taggart who has been working closely with your state water engineer I believe can address that accurately for you.

MAJOR TAGGART: What we have accomplished thus far is to do an analysis of the water requirements both in urban areas where there's an increase in population and for construction. That estimate for construction includes the amount of water necessary to do the projected upgrade of the defense access roads. And that is projected approximately 500 acre feet of water over a five-year construction period over the entire deployment area.

I'm sure that all of you folks who farm understand water very well and realize that 500 acre feet of water over that area over that time is not a tremendous amount of water. The estimate was done, very conservative estimate, and we feel very confident that the need will be within that 500 acre feet.

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COLONEL SMITH: The next card that I have is that of Dr. Ira Helfand, a physician speaking on half of Physicians for Social Responsibility. I believe it's Northampton, Massachusetts is where he's from.

286 DR. HELFAND: Thank you. The Physicians of Social Responsibility is an organization of medical doctors in the United States. There are 20,000 of us at this time who are concerned with educating the public about the medical consequences of nuclear war.

I also would like to speak to this rather curious statement in the impact statement to the effects of war are speculative, and therefore will not be deale with in this document. I find it almost incomprehensible that you have come to this community to convince people to accept in their midst 1,000 warheads of destruction and yet you tell people here that you're not able to explain to them what's going to happen if these weapons are used.

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They have a right to know, and if you yourselves don't know, you also should know. There's an enormous volume of material available to anyone who cares to look at it that describes the effects of nuclear war, and I'd like to go over some

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of that very briefly for you.

The first thing that will happen in the event of a nuclear war if the MX Missile System is deployed here, this will become the highest priority target in the continental United States. It will take precedence over Washington. It will take precidence over New York City.

Each of the 100 missiles are targeted with at least two incoming ICBM's with an average of two millitons. That's total of about 40 million tons of explosive target on this area. That's the equivalence of 3,500 Hiroshima-size bombs detonating over the Panhandle of Nebraska and Southeastern Wyoming. That attack will destroy everything in this area, part of the larger attack that will destroy almost everything in the United States.

The Defense Department says in the event of all-out nuclear war, 6,559 megatons of nuclear destruction will fall on the United States. That's the equilalence of over 500,000 Hiroshima-size bombs. The death toll from this attack will leave 86 million people dead in the first half hour, 50 million people additionally dying in the first month, and of the 100 million survivors in this country, 40 million seriously injured and 60 million with lesser

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injuries.

That is simply the immediate, direct effects of the attack within the first month. It does not take into account the effects of starvation, radiation poisoning, epidemic disease, total break-down of the structure of our country upon which we are all dependent on, ecological, environmental effects which will be anticipated as well.

The reason that many of us are so concerned about this missile, in particular the MX, is that far from being a peacekeeper, this is a weapon system which dramatically increases the chances of nuclear war. The MX was designed as a silo busting first-strike weapon. It is seen that way by the Reagan Administration. It was seen that way by the Carter Administration. It was seen that way on the drawing board by the Ford Administration. It is also seen that way by the Soviet Union.

And the deployment of these weapons will create a situation where an international crisis of the Soviet Union may well launch its nuclear weapons against the United States out of a fear if they don't, they will be destroyed on the ground.

They too sometimes seem to show more regard for their missiles than for their children. And I

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think the deployment of this weapon system in addition to the dislocation which it will cause locally in this community, the destruction which will guarantee this community in the event of nuclear war, threatens seriously to undermine the strategy of peace which we live under now. Thank you.

COLONEL SMITH: Thank you very much, sir.

CAPTAIN MCMULLIN: We certainly appreciate your comments and recognise your concerns. The statement that we made in this Draft Environmental Impact Statement regarding that we were not addressing the effects of nuclear war because it was of speculative and beyond the scope and peacetime operation and deployment of this project, and maybe I can just briefly explain and then perhaps Major Walsh can address what specifically we are looking at in the Draft Environmental Impact Statement Study and the reasons why.

First of all although we can with some certainty project various outcomes of a nuclear attack, it is very difficult to quantify and qualify or evaluate the specific outcomes or impacts of a

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nuclear war because they are scenario-dependent. And let me explain what I mean by that because when you think of the destruction of nuclear weapons, it's hard to conceive it could be scenario-dependent. But we're talking about outcomes of war.

We could start at the lower end of the spectrum of a conventional attack, and the possibility of that escalating is certainly a possibility. But we could also go to the other extreme of an all-out nuclear attack which obviously would be very devastating. But to actually qauntify that and qualify it or give some evaluation to that would be very difficult.

Secondly, regarding the scope and why it is not within this scope, first of all, if we were to limit it to just this particular area of deployment, we will have to I would say -- would be unfair to the rest of our country for the simple reason that we have more than 30 states in our country that have deployed within them strategic nuclear weapons.

And lastly, and I suppose perhaps the most important, is that the primary purpose to revitalize or to modernize our landbased forces is to enhance our deterrent capability which I might address as the policy of the United States. Our nuclear

strategy policy is one of deterrence, not first strike. That is not a first-strike weapon.

And the reason for that, and the administration has made vocal those reasons, is that in order for deterrence to work, we, the United States, needs to demonstrate a capability to effectively retaliate against those forces which the Soviet Union values the most. Those forces are their leadership facilities, their command and control and communication facilities and their strategic forces, primarily their land ICBM's.

However, it is unlikely and pragmatically impossible for them to simultaneously launch an attack to knock out all of our landbased systems. So deterrence is a very key part of the equation and perception by the Soviet Union of our capability to hold hostage their high value assets will indeed deter them from war.

If they feel that they can take more risk as a result of us not being able to effectively retaliate, then that increases the risk or likelihood of them initiating an attack on the United States.

LIEUTENANT COLONEL WALSH: The National Environmental Policy Act addresses the

physical environment, and it requires that the decision makers be aware of the consequences of their actions, the effects of their actions on the physical environment.

It further requires that there be a close, cordial relationship between the effect and the action. The decision by the President is to deploy and maintain a peacetime operation, the Peacekeeper Missile. It is also intended to deter a nuclear attack by this decision, not to anticipate it.

So, therefore, nuclear war is not, should not be part of the analyses of this Environmental Impact Statement because it is not part or tied to the decision process.

COLONEL SMITH: The next card that I have is that of, I believe it's Rojane Barrett from Harrisburg, Nebraska.

333 MRS. BARRETT: We were wondering what is the timetable we can expect to have a resolution on the effect of our land so we can plan our lives? **185**

CAPTAIN MCMULLIN: It's good to see you again, Mrs Barrett. As we discussed before, based on our estimates right now, we plan to regarding the safety zone that may indeed need to be increased around the silo that is on your land or

nearby your residence, until we validate that safety zone requirement, whether or not it will have to be increased over that which is currently there, the 1,200 foot restricted easement with the Minuteman, there is no need for you to make a decision.

We anticipate that the testing analysis will be completed as I stated earlier in the spring of '84. At that time we will inform you of the results of that test and as we, of course, lay out the options, and there are a variety of them and certainly not exhausted, and we would hope you would look at some others. And we would be happy to respond to any other alternatives other than the sale or the relocation or the exemption option.

But as you know, the exemption option allows you the opportunity to stay right there, to be exempted from the safety zone. And I might point out so there is no confusion on that exemption option, that is not an exemption of liability. If indeed an accident did occur, although very remote as has been stated here tonight, the Minuteman System is a perfect system. Those same propellants of -- these propellants that are going into the MX Missile or Peacekeeper System are the same type but more importantly they've been improved. They've

been refined to offer us even more safety.

So within that exemption option, if an accident did occur, the Air Force would be liable for any property damage that would result from that accident. But the likelihood of that is so remote, it is the primary reason why we can offer with all confidence that safety zone option because public safety is paramount, and we would not want to do anything to jeopardize your life.

COLONEL SMITH: The next card that I have is that of William Olsen of Harrisburg, Nebraska.

386 MR. OLSEN: I have a question. I'd like to know what it cost to prepare this statement. **3** And then I have a second question. Did you ever expect anybody to read it? **4**

LIEUTENANT COLONEL WALSH: The cost of preparing this statement was approximately $5 million. Now let me explain the purpose of the statement. As many of you already know, the President has already made the decision to deploy the missiles, and Congress has already approved that decision.

The purpose of this particular statement now was to provide to the President an assessment of

what the impacts of that decision would be. How this particular document and the subsequent document, final Environmental Impact Statement will be the basis for making decisions on what needs to be done to mitigate the impacts of this project on the communities.

It will be the basis for federal support to various federal programs, to the various governmental entities to help them mitigate the impacts that have been identified in this particular document.

COLONEL SMITH: The next card I have is that of Howard Osborne, Presbyterian Church, Bayard, Nebraska.

289 REVEREND OSBORNE: Thank you. I am Chairman of the committee of the 13 Presbyterian churches in the Panhandle of Nebraska studying this issue for a couple of years. And I speak primarily for myself and to reflect the fact in grading this, they unanimously approved the idea of a myself just to give you the background as I speak.

I particularly like to address the handling of the objection which was raised in the preliminary meetings that the oil issue involves morality, and I believe the very brief statement 104

answered in your, in this document was that since, and been repeated here, that since the purpose of this is to deter war, therefore, it is immoral, a moral step that ignores completely the fact morality begins not only through motive and purposes but means to those ends. And it seems to me this is ignored almost completely in this approach.

I understand the bind the military is in in their obligation to carry out the decision made by the President and the Congress, but we, the citizens, also want to have our input in there. That's why we appreciate this opportunity.

There's a great deal of naivete about human 104
nature in this whole approach. It seems to me in the supposition there can be no accident, no miscalculation, no paranoid fear which will lead to the use of these weapons or weapons against these weapons is a very naive attitude of human life and our country's society and the world today.

No provision is made here for that kind of miscalculation and misunderstanding. All the eggs are in one basket of deterrence. If that fails, everything fails. And I do not believe that is an adequate approach to the problem we have here.

It is a charade in the sense this whole

business ignores the more fundamental aspects we have to deal with here. There's no evidence given in all this cause leading up to the necessity of this issue of deterrence which primarily seems to us increases our insecurity rather than decreasing it in any sense. And that is an immoral conclusion to come to it seems to me.

To set up a system which could so easily result by intentional or accident in the destruction 104
of millions of people, innocent, whether in this country or other countries around the world which invariably involve no provisions for what happens if it gets out of hand.

But as a citizen, I would invite you to look ahead and think what you think about all this when you retire and say retire now and think about that now. It would be great.

COLONEL SMITH: Thank you, sir. The next card that I have is that of Carl Mortenson from Kimball, Nebraska.

MR. MORTENSON: I have no questions.

COLONEL SMITH: No questions? All right, Sir. The next card that I have is that of Dale Anderson. I believe it's Lead III, I'm not certain of the organization, from Chadron, Nebraska.

MR. ANDERSON: No question, thank you.

COLONEL SMITH: No questions. All right. The next card I have is that of Lemore Miles of Kimball, Nebraska. Apparently no longer present.

The next card that I have is that of James Ellison or -- yes, Ellison of Gering, Nebraska I believe it is. Apparently no longer here either.

The next card I have is that of Sylvia Soule, Harrisburg, Nebraska.

395 MRS. SOULE: Thank you. What type of 143
security will there be with the MX? In the impact statement it is to be similar it says. Will the roads be completely closed off to regular traffic 145
when installing and the rerouting of the missiles?

COLONOL HICKMAN: The security for this system will be basically the same as that for Minuteman. There will be no blocking of the road in addition to what you see today which is really none. We do escort movement of some of the sensitive elements of the system, but we do not block or impede the traffic and we will not do this with this system either.

COLONEL SMITH: The next card I have is that of Doris Bowen from Harrisburg, Nebraska.

MRS. BOWEN: No questions.

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COLONEL SMITH: No questions. All right. And the next card I have is that of Connie Soule indicating no comments or questions; is that correct? Apparently not. All right.

The next card I have is that of Jeff Tracy, Scottsbluff, Nebraska, Coordinator for No MX.

275 MR. TRACY: I have a series of comments, five of them to be exact, and I would like to preface all of them with questions. I'd like to know first why the Draft Environmental Impact Statement was issued and released before all pertinent data was collected that was needed to inform the people in this area of the true impact that it will have on them. 47

The most striking example of this that can be found is in a safety quantity distance zone that will be established around the silos that does affect at this time nine families. The quantity [illegible] zone is not to be determined as you have said until this spring or late spring of 1984. 185

Our question is why try to release a document of this importance before data that affects the lives of people in the way that this does, and talking to Major Taggart, Warren Air Force Base a couple of weeks ago, I asked Mr. Taggart if the

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safety zone indeed could be larger than what it now is.

He said, "Yes, sir, that is possible." Could it also not affect other families? He said, "Yes, sir, it could affect other families." He added that it could also be smaller. In which case why release a document again like this unnecessarily upsetting people in this way? 185

I was glad to hear the statement earlier by Captain McMullin that there will be additional or that land owners are welcome to look at additional options. My question to that is why were they not listed for those land owners the first time around? And if safety is of paramount importance to the Air Force, which I hope that it is, then why can you establish a safety zone and then later in the document exempt yourself from that exact same safety zone? 190

In addition to that, if safety is of paramount importance to the Air Force, why establish the MX Missile System on a fault line that, according to the Draft Environmental Impact Statement, is by definition active? I refuse to believe in those two instances that the true safety of the public in Wyoming or Nebraska were seriously 174

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considered.

The next question I have is why is Harrisburg consistently ignored in the study? Often times it is listed in the region of influence, the area of concentrated study. However, in all situations as near as I can tell where it involves human services, social services and the things that will affect the quality of life for the people in this area, there was no detailed study done of Harrisburg. 590

And I'd like to cite one example where I think it definitely should have been. On page 327 of the Techinal Report for the transportation section, it says, "Population and associated traffic increases for Harrisburg were negligible and did not warrant detailed study."

There may well be negligible increase in traffic in Harrisburg associated with the increased population, but here's a tremendous increase in traffic that will occur with the project and that has been ignored. If you look at pages 352 and 372 in the Technical Report of the transportation section, you will see that there is at least a 50 percent increase projected through Harrisburg on one side, a 200 percent increase projected on the other 1024

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side of Harrisburg. And in Banner County there are instances where the projects had increases of traffic as much as 1,300 percent. I do not feel that that is a negligible impact. 1024

Banner County has one law enforcement officer who is on call 24 hours a day. I would project that with that type of traffic increase in addition to the safety section which says there will be moderate impact on the area, that that will necessitate another at least one other law enforcement official to be hired by Banner County, if not more, a service vehicle to go with that. And yet none of those things are looked at or projected for Harrisburg or for Banner County. Those services will come out of taxpayers' funds. 532

The point being there are several instances this not being an isolated one, where there are impacts upon the people of Banner County, on the tax payers of Banner County that have nor been addressed in the DEIS. 433

The third thing that I'd like to say, if I can find it, why was the impact assessment for roads not broken down to individual counties so that each county can see the true impact the proposed project will have on their area? The figures given in 986

aggregate impact in the transportation section for the whole project would not apply at all to Banner County. 986

And if we had time, I would like to ask if the transportation slide be shown so that we can point this out. While we're waiting for the slide --

COLONEL SMITH: Could we press on with the questions?

MR. TRACY: Yes. The fact that the whole terminology used to determine the impact on the transportation section is based on urban language and not rural language is an indication to me that the DEIS is not adequate, does not adequately address how associated traffic problems will affect Banner County.

For example, when you are talking about one of the sub-elements, the question how many cars will pile up behind another in order for it to be a low impact or for it to be rated as a low impact, the definition in the DEIS is that vehicles must wait one signalized change through -- one sequenced signalized change to red, green, yellow back to red. 1001

There are no signalized intersections in all of Banner County. And yet that is one element

that helps project that there will be a low impact on the whole project. It's very misleading to simply pick up that draft and try to project what it is or what the true impact for this county will be. 1001

COLONEL SMITH: Mr. Tracy, you do have two more questions; is that correct?

MR. TRACY: That's correct. Sorry. I'll be very brief. Why is there no detailed discussion of the impact of the placement, replacement and maintenance of the missile will have on the local population? To simply say that the transportation and the security measures used in transporting the missile are a classified document is not a valid reason for not giving a detailed discussion of how the movement of that missile will affect those who use the defensive service roads for reasons other than military purposes. 141

I would like to know why that has not been discussed and what the impact will be on the people in this area. And lastly, why were the time structures not given on how long it will take to widen the minimum of 42.91 miles of road in Banner County? Why were the estimates not given as to how long it will take to resurface at a minimum, whether that be asphalt or gravel on 64.64 miles of road in 997

Banner County? Why is there no mention of estimates of the time that will be needed to repair bridges in Banner County, if there are any, that need to be repaired? 997

And most importantly, why were the impacts of all of these things that relate to the people of Banner County on a practical daily level not broken down so that they can clearly see the disruption that they may be facing if the missile is ever deployed? 44

And lastly, one retorical question. How do you, the officers, expect the general public in Banner County, most of whom are working full time out in the field at this time of the year, to analyse a 600 page document that is a accompanied with 16 inches of technical data in a time period of four weeks to this day and a total of eight weeks to the final comment period? 23

Thank you. I would like to have some answers, please.

LIEUTENANT COLONEL WALSH: Thank you very much for your input. Your comments with respect to the analyses of the roads is well taken. We have received some similar comments from your governmental officials with respect to the coverage

of the county area portions of the roads, and we are in fact reaccomplishing those analyses so that -- because that, of course, is the purpose of these hearings to find out where there are some deficiencies so we can in fact respond to those deficiencies so we appreciate your comment there.

With respect to the lack of preciseness as to the amount of aggregate and the amount of asphalt and the timing, the reason for that is that the Air Force is not being charged with actually accomplishing that work. What basically happens is that the Air Force has developed what we call a Defense Access Road Needs Report. This report gives the specification of the vehicles that will be using the roads including the footprint, the width, length, turning radius, et cetera.

And we give this to the Military Traffic Management Command, to the Federal Highway Administration, to your state highway agencies. We also give those state highway agencies appropriate funds so that they can perform an analyses of your roads to see how they should be upgraded to meet Air Force specifications.

When that information has been completed or when that analysis has been completed and presented

through the federal agencies, the funding for that action is taken care of through the military construction funds which is in turn provided to the states to carry out the work. The state may carry out their work either through in-house resources or by contract by using county resources.

So we don't control that aspect. So all we can do is give you a generalized estimate of the materials, the timing and the manpower and the water that would be required based upon a preliminary analysis performed by the Air Force.

Now you asked some questions pertaining to the timing, and I again appreciate that point as to the fact that we could not be precise at this time with respect to the QD. However, I should refer you to the point that the Congress has designated first that we have initial operational capability in late 1986, and furthermore they have dictated to us that we have a final Environmental Impact Statement filed with the EPA by the 1st of January.

That particular direction from the Congress leads me to answering your other question pertaining to a timing of this report and these particular public hearings. In order so that the Air Force can give a proper consideration to all inputs that we

receive or that people wish to give us from the draft document and so that we may give you a first-class final Environmental Impact Statement, we do need sufficient time to review those documents. We will close this period on the 28th of November, and that gives us less than two months to respond to those particular comments.

We made the document -- excuse me. We made the document available to the public on the 14th of October. In fact, we announced to the press on the 7th of October that it was being filed with the EPA, and we in fact mailed it to all the libraries, city and county clerks and to those people who had indicated interest in receiving that document.

We attempted to get those documents -- in fact, for the most part were successful in getting those documents to those persons and to those libraries and to those agencies by the 14th of October when the 45-day comment period started.

I should also point out to you one other thing, that although the public hearings will be terminated tonight, we will still welcome your written comments as long as they are postmarked by the 28th of November. And as I stated in my earlier briefing, we give those written comments the same

consideration that we will give your verbal comments this afternoon.

With respect to your question on safety, the Air Force does in fact look at the worst possible thing that can happen. We plan for the worst possible thing that can happen. Although we have lots of confidence in our weapons system, we have lots of confidence in our fuel systems and we have a record of safety over the past 19 years, we still have to anticipate what could possibly happen if some inadvertent accident occurred.

And that's why we have established this QD, but because of our confidence in our weapon system as Captain McMullin indicated, that is why we are willing to offer an exemption if the homeowner is willing to live within that QD.

The last point that you made with respect to the fault zone, yes, we recognize there is a fault zone in the T-Flight, and we have done considerable analyses of that fault zone. I should indicate that that is a -- the area is classified as a Category I as opposed to a Category IV zone for the California area.

We have analyzed those silos assuming Category IV conditions and have found that the shock

in the silo can withstand any anticipated earth movement or fault movement that could occur there.

I think I've answered all your questions. Thank you very much for your inquiries.

CAPTAIN MCMULLIN: I believe I caught another couple of questions relating to the safety zone that I wanted to address. I think Colonel Walsh adequately addressed why we decided to put the safety zone requirements in the Draft Environmental Impact Statement.

Even prior to, before that statement was released, we personally contacted each of the nine landowners to inform them of this new proposed safety zone. Although we have not validated, we felt it important as Mrs. Barrett's question certainly suggests when she asked how much time to make a decision. But although a decision is not required immediately until a validation is complete, nevertheless it allows them the opportunity to be thinking about the various options, perhaps to be entertaining other options.

And that leads me to the next point you made regarding the other options, why did we not consider other options? We identified three possible solutions. My comment was merely received

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by the Secretary of the Air Force and his assistants to offer a listening ear to the landowners because we want to be responsive. If they have any alternatives that we have not thought about, please let us know and we will consider those and respond to them accordingly. And I think Colonel Walsh addressed the exemption option.

MR. TRACY: Can I make one response, please?

COLONEL SMITH: Yes, sir. We'll allow one quick one. We still have cards.

MR. TRACY: Just one and I will stop. With all due respect, Lieutenant Colonel, in order for you to provide us with a first Environmental Impact Statement, you said that you needed time to study that. By the same token for us to be able to examine that in detail to find out what the true impact of the MX Missile System will be maybe on the population of that area, we also need time so that you can provide us with that final and accurate Environmental Impact Statement.

COLONEL SMITH: Thank you, sir. The next card I have is that of Stephan Sidorak I believe it is, the Executive Director of Colorado Council of Churches, Denver, Colorado.

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257 MR. SIDORAK: Hello again, Colonel Smith and distinguished members of the panel. I do have something a little different to say today, and I hope after seeing you in Wyoming and later in Nebraska that I will soon see all of you sometime in Colorado.

I do want to say that we also wage psychological warfare, don't we, and I told the people in Cheyenne, Wyoming that I have lived and worked in Salt Lake City for over two and a half years where I worked very closely and laboriously with the Church of the Jesus Christ of the Latter-Day Saints, the Mormons, on the MX Missile issue.

And the Air Force told the people of Utah and Nevada time and time the MX is coming so they better be prepared, and there was nothing else they could do. Congress was authorizing the money as well.

As an old military, I will hazard nothing can stop the U.S. Air Force except of course people and people in Utah and Nevada did it. And if you have any desires to stop it, you can.

Now we have a classic instance here this afternoon where reasonable people may differ. The Air Force official posture, you don't make nuclear

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point if you simply implement it. But I asked one if Willy Captain McMillan or McMullin about President al Directive 59 under the Carter Administration, National Security Document 13 under the current administration, and I do indeed believe that a fundamental shift in U.S. nuclear policy has occurred and that the major advances in nuclear weaponry in higher yield and that circular probably indicates that the MX is indeed in of fact clearly a first-strike weapon. It is not a weapon of nuclear deterrence.

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You, yourself, even said, sir, their strategic forces, to put at risk strategic forces, primarily their ICBM's. You don't launch a first-strike capacity weapon system, a silo busting weapon system against empty Soviet ICBM silos.

As a matter of fact, if nuclear war is being speculative, there is a gross and flagrant omission for the DEIS. The U.S. Congress OTA document of '79 indicates that the efforts are not simply speculative. In point of fact, they even document the facts of various scenario-dependent attacks, namely a Soviet attack against our own ICBM's and so-called limit counter-force against them.

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If you have no idea from the drafting people of the Environmental Impact Statement of what the effects might be, I suggest you call Dr. Carl Sagan, and his colleagues have just released an extensive document significantly based on Dr. Edward Teller, the so-called Father of the H-Bomb who himself admits that the facts are very vivid, well-known among the scientific community.

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The deployment of MX is a very special scenario-dependent case and that business about the deterrence versus war fighting needs call for questions. The only reason is the more people learn about the MX, the less they like it.

I am speaking here as an official member of the Steering Committee of the Regional Council for Ministries in Impacted Areas. We want to offer the U.S. Air Force in terms of DEIS testimony today the following statements signed by 42 religious leaders representing eight western states including thirteen bishops and executives from Nebraska and eleven bishops and executives from Wyoming, the proposed deployment area for the MX Missile System.

The following statement was issued in an unprecedented news conference in Cheyenne, Wyoming on June 3 of this year. Never before have so many

religious leaders from so many Christian churches gathered together at one time and in one place to address a single issue in the western United States.

"The signatories to the following statement symbolize the wide-spread moral and religious opposition to the MX deployment which exists among the religious leaders of the main-line Christian churches of the Western United States and underscores the difficulties religious leaders confront in any attempt to reconcile the preparation for nuclear war with the Christian faith. And the whole preparation for war is or against preparation to deterrence is something that's not technically esoterical.

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"It is the hope of numerous religious leaders in the Western United States that the U.S. Air Force will take into account our concerns as we outline them as the various impacts of MX deployment are assessed.

"Furthermore, many of the religious leaders who signed the statement represent the main-line Christian churches of Colorado.

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"It is the clear intention of these Colorado religious leaders to formally and urgently request that the DEIS hearing process of the U.S. Air Force include Colorado and suggest that such U.S. Air Force DEIS hearings be held in the following Colorado communities: Denver, Fort Collins, Greeley and Sterling.

"A formal and urgent request for such DEIS hearings in Colorado will be issued, therefore, to the Secretary of the Department of the Air Force, the Secretary of Defense, the Speaker of the U.S. House of Representatives, the President of the U.S. Senate and the President of the United States in the very near future.

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"We trust that our formal and urgent request for U.S. Air Force DEIS hearings in Colorado will be looked upon most favorably and acted upon in good faith.

"Herewith follows the statement. 'We, the undersigned leaders of Christian communities with regional responsibilities in several western states of the United States, do hereby express our opposition to the testing, production and deployment of the MX Missile System. Our conclusion is based on the Biblical record, the tradition of our churches and our common moral concern over the ever escalating nuclear arms race. We want to note well that our opposition to the MX Missile System is not

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limited to possible deployment in Nebraska and Wyoming but extends to any proposed deployment anywhere in the United States."

"There are any number of reasons for opposition to the MX Missile System including [illegible] economic, environmental, and sociological. Yet our main reason for opposition to the MX Missile System is our moral disagreement with the nuclear policy which necessitates the deployment of any weapon system that boasts first-strike capability and thereby forebodes the abandonment of the doctrine of deterrence."

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Furthermore, our moral reflection on the MX Missile System leads us to the realization that its deployment could indicate the adoption of a launch on warning strategy which the Air Force has been reported to have indicated if somebody got fired in the higher excellence of the United States for foreclosures to UPI stories that appeared in the Denver Post that said there would be a possibility of launch on warning strategy which could lower the threshhold of nuclear war while increasing its likelihood by design or accident. Such a situation represents the moral nightmare of our nuclear predicament. In such a situation, and I hope you have an application to this, the just war theory becomes problematical."

"We also want to express our concerns over the budget priorities of our nation. Our sense of stewardship is disturbed by inordinate defense spending at the expense of [illegible] human need. We simply cannot tolerate budget priorities which deprive human beings of basic needs."

"Our vision of shalom is a vision of well-being for all of God's creatures. We prefer an economy of life as over against an economy of death. We recognize, moreover, that the definition of 'national security' cannot be written in strictly military terms."

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"Therefore, with one faith and with one voice, we, the undersigned religious leaders, state our moral opposition to the deployment of the MX Missile System, and we call upon the President of the United States and all members of the U.S. Congress to stop funding for the testing, production and deployment of the MX Missile System immediately something that's not too late."

"Finally, we pledge our support to any serious efforts to halt the nuclear arms race and negotiate reductions in the arsenals of all nuclear

nations."

Colonel Smith, I would like to show you the signatories for Nebraska as I have them. I won't take the time to read all the other states involved. There are about eight states.

The signatories are the Bishop Dennis A. Anderson, Nebraska Synod, Lutheran Church in America; Bishop Monk Bryan, The Nebraska Annual Conference, the United Methodist Church; Reverend Stephen C. Evans, Executive Secretary, Lincoln Fellowship of Churches.

Also some of these people also include Nebraska even though they don't live here, but their territory. You know how it is when you're on the road a lot.

The Reverend Bennett Gerardy, Executive Director Regional Minister of the Central Rocky Mountain Region Christian Church, Disciples of Christ; Suzanne R. Goodrich Executive Presbyter, Homestead Presbytery Synod of Lakes and Prairies, United Presbyterian Church, U.S.A.; Dr. Heinz H. Grabia, Executive Minister, American Baptist Churches of Nebraska; Dr. David J. Jamieson, Conference Minister, Nebraska Conference of the United Church of Christ.

Sorry it takes a while. Dr. Mel Luetchens, Executive Secretary, Interchurch Ministries of Nebraska; the Reverend Clyde H. Miller, Jr., who has the Panhandle of Nebraska Conference Minister, Rocky Mountain Conference, United Church of Christ of the Panhandle of Nebraska; Reverend John Tomlinson, District Executive Western Plains District Church of the Brethren; Bishop Wayne Weissenbuehler, Bishop of Central District American Lutheran Church; Bishop Norman A. Wick, Bishop of Rocky Mountain District, American Lutheran Church.

Thank you for your time.

COLONEL SMITH: Thank you very much, Sir. The next card I have is that of Marla Painter representing Western Solidarity. Miss Painter.

306 MS. PAINTER: I am here to represent Western Solidarity, an eight state alliance of organizations and individuals who are concerned about the deployment of the MX.

I'm also a veteran of the Utah and Nevada struggle and although my family hails from Nebraska, I now live in Washoe Valley, Nevada.

First I have some serious concerns about the basic illegality of this process. The Air Force is unfortunately not complying with the law, in this 76

case the National Environment Policy Act. NEPA clearly states that an Environmental Impact Statement is not to be used to justify a decision which has already been made, but is to provide criteria with which to make a decision about the proposed action, in this case deployment of the MX.

Although the Air Force explains that they are following a Presidential order, I must respectfully maintain that even the President is not exempt from the law. In consultation with the attorneys, we also maintain that the so-called Jackson Amendment exempts only the Presidential report on alternative basing modes. The EIS is an EIS process and not the specified silo basing proposal. Additionally the DEIS lacks any serious discussion of the no-action alternative which is the heart of any EIS. 76

For instance, what would occur to the effected area were MX not to be deployed? If $40 billion were freed through the economy, what impact would that have on free enterprise, on economic development of this region? I might refer -- I might refer you to the work the Air Force, the work of the Counsel on Economic Priorities of Dr. Andersen at the University of Michigan.

Now in order to understand the full impact of this proposed deployment, we also must understand the impact of no action. Any opinion is only good as the validity of the background information from which it's drawn, and there is gross inadequacy in the DEIS. 76

When an Environmental Impact Statement is done on a proposed dam or a highway, the document addresses obviously the use of that project. Yet somehow we're told that the impacts of the use of this weapon upon are "speculative." I submit that this is untrue. As with Reverend Sidorak, I am quite aware that one can study the Office of Technical and Logical Assessment's findings for Social Responsibility and most recently the findings of this distinguished international panel of scientists who spoke of coming up with findings on the impact of a nuclear confrontation which can cite specifics and which were called "robust" in their consistency. 37

The people of this region deserve to know the consequences of this region being used as a nuclear sponge to absorb the Soviet first strike, for whatever reason, whether to buy time for the President to decide what to do or some other reason

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I can't quite come up with.

Now if the area is not intended to act as a sitting duck to attract the enemy, nor is it to be a first strike, used as a first strike weapon even though it is a first strike weapon because that is against U.S. policy, then we see no way around the Air Force not adding anti-ballistic missile defense system or super hardening the silos which would create enormous impact on agriculture if for no reason, for no other reason because they must take large amounts of water. And we know that because there have been studies done.

Now as well, it's also important to remember that some form of a single warhead missile probably mobile in part is also part of the Scowcroft Commission Report and people in the west, and I've talked to many of them by the way in the eight state region that I work in, want to know what the projected impact of this project might be.

And because this is an intregal part of the Scowcroft Commission because the MX is part of that package deal, we deserve to know that. Now I also want to reiterate that the MX is not a Minuteman Missile. It is not a comparable missile being dumped into a silo. It is a very different missile.

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Very scary missile and it will put Soviet Union on a launch on warning mode.

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I also want to remind the people of this region and the Air Force that this is not a moot process, and it saddens me to see people who live in democracy stand up and say they have no power, that these hearings are nothing, that they have no say. Why are we building the missiles to protect us if it's not our rights as Americans?

So I want to emphasize that we have three years to go before this thing happens and the Congress just appropriated the money for 21 missiles only 21 missiles. And those missiles will not be put in the ground until 1986. And by that time we may have have a very different Congress and a very different President.

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As you all know, all of the candidates who are potentially running against Mr. Reagan are against the MX Missile, and that's not any kind of an endorsement. That's just a reality. So I want to emphasize to everyone to not give up this process. There's more to come, and if you feel in your hearts that this isn't right, you need to start standing up and voicing that.

Thank you very much.

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COLONEL SMITH: Thank you very much, ma'am.

COLONEL SMITH: That's the last of the cards that I have here. Are there any questions or statements from people who did not fill out cards? We'll be happy to take them now if anyone has any questions that have been generated by the presentation or the questions and responses.

CITIZEN: We didn't get to see the picture on the screen that he asked about showing.

COLONEL SMITH: I think that was a slide with respect to roads; is that correct?

MR. TRACY: That's correct. Can I come down for a minute? The reason I have to come down is because I don't have my glasses. I apologize. What I wanted to point out was that -- wait, that is not the one I needed. I need the transportation section before I start. I'm sorry. The roads --

LIEUTENANT COLONEL WALSH: That is the transportation section.

MR. TRACY: Excuse me. No, I would like the one that shows the aggregate impact of the transportation.

LIEUTENANT COLONEL WALSH: That's it.

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MR. TRACY: No. Okay. What I would like to know is the breakdown. We have the delays, the physical conditions or is that not --

LIEUTENANT COLONEL WALSH: That is not on a slide.

MR. TRACY: My apologies. Then I will say that with the transportation section on site location is to be a low significant impact. There are silos where there is undoubtedly going to be traffic. But what is applicable to Banner County in my estimation is that there are areas where there will be on site 1,300 percent more or 1,300 percent increase in traffic than what is now projected, 1,300 percent increase. And if you'd like, it's on page 352 in the Technical Report on transportation, and page 372 in the Technical Report on transportation.

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That I cannot believe is a low impact on the site, and it's certainly not a low impact on the local level. The point being that if you look at this particular graphic, it doesn't give people in Banner County or in Kimball County or I imagine most of rural areas in Wyoming an accurate assessment of the impact there. Am I right or wrong on that?

986

LIEUTENANT COLONEL WALSH: As I

indicated earlier, we will take your comment and we will go back and relook at our analysis.

MR. TRACY: Thank you.

LIEUTENANT COLONEL WALSH: Thank you very much.

MR. TRACY: I think my question is when the final Environmental Impact Statement is out and then we know the total impact that it will have on Banner County, what recourse do we have at that time? 30

LIEUTENANT COLONEL WALSH: Let me point out that the impacts that we identify are those that would occur without taking any litigation actions. Naturally we will offer some mitigation actions to local governmental entities that will reduce those impacts. The selection of those mitigation activities is at the option of the local governmental entities.

Once they have made the decision that is their prerogative, then we shall help them implement it. What we have in DEIS as I've said on previous occasions is not a preview for the future but rather a projection of the future without mitigation.

Naturally we do not want those impacts to occur, and we -- as I indicated, we are going to

work very closely and have been working very closely with local governmental entities to build those mitigation actions to make sure that they do not occur.

MR. TRACY: I did not mean to imply that you did not try or did not want to try to mitigate those impacts. My question again is why is the information not available to us at this time so that we can see what the impacts are going to be. Thank you. 47

COLONEL SMITH: Do we have any other questions or statements? If we do if you could please raise your hands, state your name if you'd like to, why we're certainly accept them at this time. Yes, Ma'am, over here on the aisle.

CITIZEN: My question is what do you plan to do to help the fire department in Banner County. It's an all volunteer department, and I'm not sure that we have other equipment and manpower to handle an accident at one of the MX sites should there be one at any time. 542

MR. HICKMAN: Although information on the various fire departments, both volunteer and paid, in the six-county region in which the Peacekeeper Project is proposed is those are not all

included directly in the DEIS. They were all looked at with respect to their facilities, equipment and personnel within a separate document which is the Wyoming-Nebraska Socioeconomic Study. This study is now one of the technical reports for the DEIS.

Within the study we have recognized that number 1, within the local area the increase in residential population is essentially expected to be very small, if any. However, other use of both emergency and fire vehicles is possible.

We have suggested as part of the overall mitigated program that working close with the Air Force itself, the cooperative agreements can be made for providing for emergency situations, and if it is determined as the project is completed in its planning if it is determined that a specific emergency situation might arise with a high probability, then mitigations to provide additional equipment and/or personnel will be recommended.

COLONEL SMITH: Do we have any other questions or comments?

(No response.)

COLONEL SMITH: I don't see any hands. Does the panel have any final comments?

LIEUTENANT COLONEL WALSH: If you do

have any other comments, questions that come to mind after this evening, you may send them to the address that we have showed previously on the screen and that is on your handout that was handed to you as you came in this evening.

If you do have some specific questions, we do have two gentlemen in the area who will be most happy to respond to them. The first person is Colonel Hickman who will be the Commander of the Site Activation Task Force. He'll be responsible for the actual construction activities and for the assembly and check-out activities. He will be the person to contact if you want to know how we're going to work in the deployment area or carry out the construction activities themselves.

We also have Captain McMullin, and the address and phone number is shown and you should contact him if you need some more information regarding the United States defense policy, the particular decision here to deploy this particular weapon system.

Thank you very much for your attendance here this afternoon.

COLONEL SMITH: And we all thank you very much. Thank you very much. The hearing is

adjourned.

(Hearing proceedings concluded 5:30 p.m., November 4, 1983.)

C E R T I F I C A T E

I, KIM BROWNING, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 90 pages constitute a full, true and correct transcript.

Dated this 9th day of November, 1983.

KIM BROWNING

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PEACEKEEPER IN MINUTEMAN SILOS

ENVIRONMENTAL IMPACT STATEMENT PROCESS

TRANSCRIPT OF HEARING PROCEEDINGS

PURSUANT TO NOTICE the following Public Hearing took place on Friday, November 4, 1983, at 8:00 o'clock p.m., in the Kimball County High School, Kimball, Nebraska, before a team of specialists and experts including: Col. Warren Hickman, Site Activation Task Force Director at F. E. Warren Air Force Base; Lt. Col. Reese Padfield, Assistant Chief of the Environment and Integration Division of the Ballistic Missile Office at Norton Air Force Base, California; Maj. David Taggart, Staff Judge Advocate of the Civil Engineer's Office at Norton Air Force Base, California. Capt. Mike McMullen, Headquarters Peacekeeper Liaison Officer, Cheyenne, Wyoming. Also Mr. Fred Hickman, Human Resource Director for the URS Program, San Bernardino, California; and Mr. Dick Kramer, Natural Resource Director for URS, San Bernardino, California.

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PROCEEDINGS

(Whereupon, the following proceedings occurred on Friday, November 4, 1983, at 8:00 o'clock p.m., in the Kimball County High School, Kimball, Nebraska.)

COL. SMITH: Good evening, ladies and gentlemen. Welcome to the seventh scheduled hearing in Nebraska and Wyoming on the Draft Environmental Impact Statement for the Peacekeeper in Minuteman silos program.

I am Col. Allan Smith, Air Force Trial Judge, and I've been appointed as hearing officer for this series of hearings. My role is simply to conduct the hearings. I am not involved in the development of the Peacekeeper project. I will not be making any recommendations or decisions concerning it.

First on the agenda this evening is an explanation of the Peacekeeper project and draft statement by Maj. Ron Torkerson. Following his presentation statements and comments from government officials will be received. We will take a short break and after the break statements, comments and questions from representatives of organizations and individuals will be accepted.

We ask that speakers try to limit their comments to approximately five minutes. Questions will be answered by our team of experts and specialists. The hearing is

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scheduled to conclude at 11:00 p.m. this evening. To provide the greatest opportunity for all of those who wish to present comments or questions, we do request that you fill out one of the cards in the lobby. Speakers will be recognized from the floor only if time permits and only after all registered to speak have had an opportunity to do so. If time does not permit you the opportunity to speak tonight, you certainly may submit written comments or statements. This may be done by dropping them in the box on the table in the lobby or by mailing them to the address in the hearing handout which will also be placed on the screen at various times during the evening.

A court reporter is present this evening and a verbatim transcript of the hearing will be made. A videotape of the proceedings is also being made as a backup to the transcript to insure that the record is accurate and complete.

We have Mayor Edith Haines and staff representatives of your Congressional delegation as well as representatives from your government present in the audience this evening. We certainly welcome their presence. Capt. Pat Maloney is present in the rear of the room to handle any special requests that the press may have, and we're now ready to begin the briefing on the Peacekeeper project. To present

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that is Maj. Torkerson.

STATEMENT

MAJ. TORKERSON: Good evening, ladies and gentlemen. I am Maj. Ron Torkerson, the Deputy Director of the Environmental Planning for the Air Force Regional Civil Engineer's office at Norton Air Force Base, California. In this position I'm responsible for the preparation of the Environmental Impact Statement for the Peacekeeper in Minuteman silos project.

Today I intend to summarize the major findings of the Draft Environmental Impact Statement issued on October 14 for the project. However, before reviewing the findings I shall provide the background and context for the statement. Specifically, I shall cover the following subjects: First I shall review the events leading to the Presidential decision to deploy the Peacekeeper in Minuteman silos.

Second, I shall briefly describe the project. Third, I shall discuss the scope of the environmental impact statement. Next, I shall describe the process and methods used in preparation of the statement. This will be followed by an overview of the principal findings. Finally, I shall discuss future activities leading to the final environmental impact statement.

The same briefing will be presented at all public

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hearings so everyone will receive the same information.

Presidential Decision. In accordance with the Presidential decision of April 19, 1983, the Air Force plans to deploy the Peacekeeper missile system within the 90th Strategic Missile Wing at F. E. Warren Air Force Base near Cheyenne, Wyoming. In making this decision, the President was adopting the recommendation of the Scowcroft Commission. The Scowcroft Commission had been formed by the President on January 3, 1983, in response to issues raised by Congress in the 1983 Defense Appropriations Act.

Project Description. The project described by the President entails: Replacement of one hundred of the existing Minuteman III missiles with one hundred Peacekeeper missiles in the 400th and 319th strategic missile squadrons located near Cheyenne.

In other to implement this decision, the following actions are required: Modification of existing facilities and construction of new facilities at F. E. Warren Air Force Base. Modification of one hundred missile launch and ten launch control facilities in the aforementioned squadrons. Installation of five additional buried cable systems connecting the two squadrons. Upgrading the existing deployment area road network.

The project will commence in early 1983, soon after

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the final environmental impact statement is filed. Initial operational capability, defined as the first ten operational missiles, is scheduled for late 1986. Full operational capability is scheduled for late 1989.

Operations of the Peacekeeper will be similar to the Minuteman system. The major differences are in the trasport and emplacement of the missile. The Minuteman stages are transported fully assembled and emplaced in the silo with the same vehicle. Peacekeeper stages will be transported individually by one vehicle, and emplaced in the silo by another vehicle.

Once fully operational, security and maintenance operations in the deployment area will be similar to those now in effect for the Minuteman system.

Similarly, the Peacekeeper system will be as safe, if not safer, than the Minuteman system. An accidental burning or detonating of a Minuteman has never occurred during any of its past nineteen years of deployment. The peacekeeper system has benefited from this field experience as well as improvements in technology. Development and use of insensitive high explosives in the Peacekeeper reentry system represents an important safety improvement. Insensitive high explosives are particularly effective in ensuring that ignition occurs only upon direct command. The syster is

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designed so that the probability of unintentional nuclear yield is less than one in one billion per service life of the system. Additionally, the probability of an inadvertent launch of the fully assembled weapon system is less than one in ten trillion.

Scope of the Environmental Impact Statement. Given the Presidential decision and its implementation requirements, the Air Force prepared the Draft Environmental Impact Statement in accordance with the council on environmental quality regulations. The statement assesses the impacts of the deployment and peacetime operation of the system, alternative project elements, and the no-action alternative of retaining the existing Minuteman III missiles.

This statement does not cover the analyses of alternative basing modes, nor deployment locations for the Peacekeeper missile. Provisions to the Department of Defense Appropriations Act of 1983, known as the Jackson Amendment, exempted such analyses from the requirements of the National Environmental Policy Act.

Likewise, analyses of other basing modes such as super hardening of protective structures, deep basing, and ballistic missile defense are not included in this statement. They are excluded because first, they were not part of the President's decision; second, the Air Force does not intend to

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propose any of them in the reasonably foreseeable future, and third, Peacekeeper deployment is not connected to any of these potential systems.

Furthermore, the environmental impacts of nuclear attack are not analysed in the statement because the effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operation.

Process and methods. Following the President's decision and subsequent approval by Congress, a notice of intent to conduct the environmental impact statement process and the schedule for scoping meetings was published in the Federal Register on June 13, 1983. The scoping meetings were held between June 27 and July 8, 1983. Public meetings were held in Cheyenne, Pine Bluffs, Torrington and Wheatland, Wyoming; and Kimball and Harrisburg, Nebraska. Additional meetings were held with federal agencies in Denver, Colorado, and Kansas City, Missouri, and with Nebraska state agencies in Lincoln, Nebraska. The purpose of these meetings was to obtain information for the preparation of the document. Information obtained included concerns and issues and detailed data on specific environmental resources. This information contributed further to the determination of environmental resources to be studied.

A study area was defined for each environmental

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resource in a two step process. Study areas initially encompassing the location where impacts, both direct and indirect, might be expected to occur were termed the region of influence. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project. Following data collection on existing conditions in these regions of influence, a preliminary analysis was conducted to determine which location or locations within the region of influence would experience potentially important impacts. These more defined locations were then identified as areas of concentrated study. The limits of these areas were used to concentrate the data collection activities and to facilitate the detailed impact analysis.

Impacts were analyzed within both the regions of influence and the areas of concentrated study. Four categories formed the framework for impact analysis. They are area, timing, intensity and significance.

Area is defined as either site, local or regional. Site is where direct project activities occur. Local is the city or other political jurisdiction surrounding the site. And, region is the previously discussed region of influence for each resource.

Timing is defined as either short term or long

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term. Short term is the period from commencement of work until the system is fully operational, late 1989. Long term is the fully operational phase of the system beginning in 1990 and continuing until a decision is reached to decommission.

Intensity is defined as negligible, low, moderate or high. Intensity levels are defined by resource specific criteria and are a measure of the amount of change to the resource caused by the project.

Significance designates an impact which either requires heightened attention during project planning or requires extensive action to mitigate.

Upon completion of the analysis, the draft statement was prepared and distributed for comment. The draft statement consists of four chapters and a summary totaling about 500 pages. A set of thirteen environmental planning technical reports support the draft statement and are available for review at local libraries.

Notice of availability of the document was published in the Federal Register on October 14th. On that date, the document was also available at libraries and federal, state and local agencies within the study area.

Findings of Draft Environmental Impact Statement. In this review, I shall present a description of each resource

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studied. This will be followed by a description of beneficial effects, if any, and a summary of the area, timing and intensity of adverse impacts. Major reasons for the impact conclusions will be presented. Finally, if the impact has been judged to be significant, the rationale for such judgment will be given.

Employment Demand I. Employment demand describes the available regional labor force which may be used by the project, and the demand for non-local labor which may result in the immigration of workers and their families.

The analysis indicates a short and long term, beneficial effect on the City of Cheyenne and the region of influence because of increases in employment and income.

During the peak employment years 1986 and 1987, approximately 3,300 persons will be employed as a result of the project. There will be about 1,800 direct and 1,500 indirect jobs. Approximately 1,000 of the 3,300 jobs will be filled by people presently residing in the local area. The balance of the personnel requirements would be filled through either immigration or weekly commuting.

When the system is fully operational, there will be over 600 additional jobs in the area. Approximately 200 of these jobs will be filled by local residents.

Housing I. Housing includes the existing housing

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stock and the capability of the private housing industry to respond to changes in housing demand.

Local, short and long term beneficial effects result from potential increases in sales value and rental income due to increased housing demand in the Cheyenne urban area and the City of Kimball. There is, however, an opposite effect on the consumer, particularly those on fixed income and first time home buyers.

The analysis indicates a local, short term, moderate impact because the demand for mobile homes in both the Cheyenne urban area and the City of Kimball exceeds the projected net vacancy rate. Also the market response would have to exceed the highest historical annual production level. The analysis further indicates local, long term, low impacts because of the excess housing supply and a high net vacancy rate in the Cheyenne urban area as outmigration occurs during 1986-1990.

The local, short term impacts were judged significant because the demand for mobile homes will exceed the highest historical annual production level and the housing industry sales will shift to a larger volume of mobile homes.

Public Finance. Public finance describes the budgets, fiscal resources and obligations of all major governmental entities, including school districts and urban

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service areas.

The analysis indicates a local, short and long term, beneficial effect because of additional revenue to governmental entities due to increased sales and property taxes, and other taxes and fees.

The analysis further indicates local, short term, moderate impacts because many local governmental entities would face potential budget imbalances. This would require either an increase in revenues or a reduction in service related expenditures during peak project activity. The analysis also indicates local, long term, low impacts because during the operational phase, these increased expenditures may be offset by increased revenues.

Construction Resources I. Construction resources describes the construction materials market for cement, coarse and fine aggregate, ballast, asphalt, roofing, lumber, wood ties, structural steel, reinforcing steel and steel rail.

The analysis indicates that regional, short term beneficial effects may occur with the greater utilization of existing production capacities to meet the increased demand for specific construction materials.

The analysis further indicates a regional, short term, low impact resulting from the project's increased

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demand on regional production capacities of cement, aggregate, ballast, asphalt and roofing.

Social Well-being I. Social well-being includes an assessment of the quality of life of area residents by identifying information on local issues, opinions, and selected indicators of behavior.

A local, short term beneficial effect is anticipated due to the improved economy.

The analysis indicates local, short term, moderate impacts as a result of inadequate local, public and private resources available to deal with the social adjustment and social integration problems associated with the immigration of population.

The analysis further indicates that the local, short term impacts were judged significant because the population subgroups affected may not be able to adjust or assimilate through existing institutional and informal social structures. These groups include unsuccessful job seekers, adolescents and fixed income elderly.

Public Services and Facilities I. Public services and facilities are those services provided by governmental and other authorized agencies to meet the health, safety, and welfare needs of citizens. Included in this category are general government, education, law enforcement, criminal

justice, fire protection, health care, human services and libraries.

The analysis indicates local, short term, moderate impacts. These impacts are due to a 7 percent increase over what is projected for the student population without the project in Laramie County School District No. 1 in the peak year, 1987. Also contributing to the impacts is the need for additional firefighters, vehicles and space for the City of Cheyenne Fire Department; the need for increased staffing for law enforcement in both Laramie County and the City of Cheyenne; and increased demands in health care and human services.

The analysis further indicates local, long term, moderate impacts are a result of the continued need for additional staffing and classroom space in Laramie County School District No. 1. These impacts are also the result of the need for an additional law enforcement officer in the City of Cheyenne.

The local, short term impacts were judged significant because of overcrowding of the school system, the potential for a decline in safety due to inadequate traffic control, and the potential for human service needs that are unsatisfied.

Utilities I. Utilities describes water treatment and distribution systems, wastewater systems, solid waste

systems, stormwater facilities and telephone service.

The analysis indicates that site, short term, low impacts are a result of a further overloading of an existing sewer downstream of the F. E. Warren Air Force Base sewer and from the need for additional on-Base telephone equipment. Local, short term, low impacts result from the further degradation of the performance of existing wastewater systems in the Cheyenne urban area and in Torrington. Also contributing to the impacts is the need for additional equipment for solid waste collection and disposal and stormwater facilities in the Cheyenne urban area as a result of new land development in the region.

The local, short term impacts were judged significant because the overloaded operating condition of the wastewater systems in the Cheyenne urban area and in Torrington will be aggravated.

Energy Resources I. Energy resources include the supply and distribution systems for electrical power, natural gas, petroleum fuel and coal.

The analysis indicates local, short term, moderate impacts as a result of the need to expand the capacity of a local electrical substation serving F. E. Warren Air Force Base by about 40 percent. Local, long term, low impacts result from increased energy demands. The analysis also

indicates regional, short term, low impacts as a result of the depletion of non-renewable energy resources from the construction phase of the project. Regional, long term, low impacts are a result of the depletion of non-renewable energy resources by Peacekeeper operating personnel.

Transportation I. Transportation describes the various modes of travel used for the safe and efficient movement of persons and goods. This includes transporation planning, design and operation of roads, railroads, aviation facilities, public transit and pedestrian and bicycle facilities.

A long term, beneficial effect is anticipated due to the improvements to roads and bridges at the site, local and regional levels.

The analysis indicates site, short term, low impacts as a result of construction activities on and near roads in the deployment area. Local, short term, moderate impacts are indicated as a result of reductions in the level of service at thirteen of twenty-six impacted intersections and interchanges in the Cheyenne urban area. This is because of the expected congestion at the F. E. Warren Air Force Base Randall Avenue gate due to the influx of construction workers and materials onto the base. The analysis further indicates regional, short term, low impacts as a result of existing

capacity constraints and increased demand at Cheyenne Airport.

The site, short term, low impacts were judged significant because motorists traveling on roads affected by construction activities in the deployment area may be delayed or have to seek alternate travel routes. Local, short term, moderate impacts were judged significant because the level of service will be reduced below minimum desirable design standards in the Cheyenne urban area and construction delays may impact Randall Avenue at the Interstate 25 interchange.

Land Use I. Land use comprises both urban land uses in developed communities where population immigration is expected and rural land use in the deployment area where direct impacts from project development would occur.

A local, long term beneficial effect may occur from the infill of vacant areas within the city boundaries of Cheyenne and Kimball.

The analysis indicates site, short term, low impacts are a result of the temporary interruption of agricultural land use during cable trenching. The site, long term, low impacts are a result of restrictions on residential land use within explosive safety zones. The analysis also indicates local, short term, low impacts are a result of the underutilization of land developed to support mobile homes

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beginning in 1987 as out migration begins. Local, long term, low impacts are a result of the continuing underutilization of land developed to support mobile homes.

Recreation I. Recreation includes regional, resource-based, recreation which is related to federal, state and other lands offering rural outdoor recreation opportunities and local, user-based, recreation which is related to municipal and county-owned parks and facilities within urbanized areas.

The analysis indicates local, short term, moderate impacts as a result of increased demand for park land, facilities, and staffing. The analysis also indicates local, long term, low impacts because Peacekeeper operating personnel will continue to place pressure on the recreation system, requiring additional expenditures for operations and maintenance.

The analysis further indicates regional, short term moderate impacts primarily as a result of increased demand at Medicine Bow National Forest and Curt Gowdy, Vedauwoo and Guernsey State Parks. These regional impacts become low in the long term due to reduction in the number of users when outmigration occurs.

Local, short term, moderate impacts were judged significant because of the need to seek [illegible]

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the normal budgetary process in order to provide additional local parkland and recreational facilities. Regional, short term, moderate impacts were judged significant because the additional use of regional recreation facilities will exacerbate an existing overcrowded situation thereby contributing to a noticeable decline in the perceived quality of the recreational experience.

Cultural Resources I. Cultural resources include four separate elements: Palenontological, prehistoric, historic and American Indian cultural resources.

The analysis indicates site, short term, moderate impacts as a result of ground disturbing activities associated with the Peacekeeper deployment that may affect historic and prehistoric sites. The analysis also indicates site, long term, low impacts as a result of the use of buildings at F. E. Warren Air Force Base currently listed on the National Register of Historic places.

Visual Resources I. Visual resources include scenic resources and the visual environment, as well as an evaluation of the visual quality of the region.

The analysis indicates site, short term, low impacts due to clearing of vegetation and grading activities during construction.

Water Resources I. Water resources includes ground-

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water hydrology and quality, surface water hydrology and quality, water use and demand and constraints on water use.

The analysis indicates site, short term, low impacts at F. E. Warren Air Force Base, launch facilities and upgraded roads in the squadrons. This is the result of small increases in water demand and minor changes in hyurology. Site, long term, low impacts are a result of permanent changes to stormwater runoff characteristics. The analysis also indicates local, short term, moderate impacts because induced water demand exceeds the projected capacity of the existing delivery system for the Cheyenne urban area.

Local, long term, low impacts are predicted because of increased water demands, increased surface runoff and increased erosion and sedimentation in the Cheyenne urban area. Regional, short term, low impacts are also predicted as a result of increased runoff entering Crow Creek due to additional development.

The local, short term, moderate impacts are judged significant because of interference to existing water users and potential water quality and flooding problems.

Biological Resources I. Biological resources include vegetation, wildlife, fisheries and unique and sensitive habitats.

The analysis indicates site, short term, moderate

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impacts as a result of the potential immediate disruption, by construction or modification activities, or riparian vegetation and wildlife habitats. The analysis also indicates site, long term, moderate impacts as a result of construction activities that may potentially distrupt trees and shrubs in riparian and wetland habitats that have long recovery periods. The analysis further indicates that there are regional, short term, moderate impacts. These are the result of general recreational pressures, poaching, dog kills and vehicle collisions on big game in Medicine Bow National Forest and Curt Gowdy State Park. Regional, long term, low impacts are a result of the random shooting of the Swainson's Hawk and other birds of prey.

The site, short term, moderate impacts were judged significant because of the limited extent of riparian and wetland habitats. The site, long term, moderate impacts were judged significant because of the long recovery periods of the riparian vegetation.

Regional, short term, moderate impacts were judged significant because of concerns about the random shooting of birds of prey and the effects of increased human activity on big game in areas of concentrated recreation pressures. Regional, long term, low impacts were judged significant because of concerns over declining populations of some species

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of birds of prey.

Threatened and endangered species I. Threatened and endangered species include plants, wildlife and aquatic species which are protected by federal law as threatened or endangered. Also included in this category are state protected rare, threatened or endangered species. Although state species are not afforded the same protection as federally listed species, they were included because of special state concern.

The analysis indicates site, short term, high impacts as a result of the disturbance of the habitat of the Colorado Butterfly Plant and the Wooly Milkvetch. Site, high impacts will continue in the long term as a result of the loss of habitat for the Colorado Butterfly Plant. The analysis further indicates regional, short term, low impacts as a result of the potential for random shooting of the Bald Eagle and accidental catching of the Greenback Cutthroat Trout. Regional, long term, low impacts are a result of the continuing potential for random shootings of the Bald Eagle.

All of these impacts were judged significant because the Bald Eagle and Greenback Curthroat Trout are federally listed endangered species, also, the Colorado Butterfly Plant is categorized as a category one species by U. S. Fish and Wildlife Service and the Wooly Milkvetch is

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listed as rare by the Wyoming Natural Heritage Program.

Geologic Resources I. Geologic resources include geological hazards, energy and mineral resources including aggregate and soil resources.

The analysis indicates site, short term, low impacts as a result of the potential for soil erosion during construction activities. The analysis further indicates local, short term, low impacts as a result of the need for aggregate resources for project construction activities including road construction and upgrading. The analysis also indicates local, long term, low impacts resulting from the need for aggregate resources for road maintenance.

Noise I. Noise analysis includes vehicular, air and railroad transporation and construction activity.

The analysis indicates that the impacts will be negligible.

Air Quality I. Air quality describes the effects of project construction, operation and related transportation activities upon future air quality.

The analysis indicates local, short term, low impacts. These are due to increases in carbon monoxide levels from increased vehicular traffic at several intersections and road segments in Cheyenne and because of fugitive dust impacts as a result of construction activities.

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Alternatives. As previously discussed, project alternatives were analyzed. These analyses focused on alternative road configurations, cable routes and staging areas. The analyses have demonstrated that for most of the resource areas, the level of impact is either negligible or low and not significant and does not vary within each of the three sets of project element alternatives. For four resource areas, transporation, land use, cultural resources and biological resources, there are variations in the level of impact among alternatives. I shall summarize these.

As shown on this slide, three alternative egress routes for transporting the Peacekeeper stages from the base were considered. Alternative R-2, which is the proposed action, is designed to allow all northbound stage transport travel to exit the Base at Central Avenue and southbound travel to access Interstate 25 at Missile Drive. This requires realignment of Happy Jack Road and removal of the existing Happy Jack Bridge.

Alternative R-1 involves alleviating the Happy Jack Road and Country Club Road bridge clearance problems, and the egress of the stage transporter at the Central Avenue interchange and at the Missile Drive interchange to travel north or south.

Alternative R-3 involves providing stage transporter

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access to Interstate 80 via Round Top Road which would require new on off ramps at Interstate 80. Access to the north would still be via Interstate 25 near the Central Avenue interchange.

The impacts among the alternatives did not vary appreciably with the exception of transportation and land use. Alternative R-3 would have a low impact to transportation because it involves a longer length of road upgrading, particularly roads off Base, in addition to new on/off ramps at Interstate 80. This alternative would have a low impact on land use because the new interchange constructed at Interstate 80 and Round Top Road may tend to stimulate urban development west of F. E. Warren Air Force Base and would be contrary to the agricultural preservation land use policies of the City of Cheyenne and Laramie County.

All three alternatives will have a moderate impact on cultural resources because each stage transmitter route has the potential for intersecting cultural properties eligible for the National Register of Historic Places. In addition, all three alternatives have a high and significant impact on the habitat of the Colorado Butterfly Plant because of potential disturbance during the construction phase of the project. This impact was judged significant because of U. S. Fish and Wildlife Service's category one

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classification of the plant species.

For the project five additional buried cables connecting the 400th and 319th Strategic Missile Squadrons will be installed. A total of ten alternative cable corridors have been identified for environmental analyses.

Three alternatives PA1, SB1, SB2 follow overland routes; two of these follow easements previously obtained by the Air Force for communications cables. One alternative PA2 follows an existing road right-of-way for its entire length. The remaining six alternatives follow routes that are a combination of overland and road right-of-way.

Impacts among the alternative cable paths did not vary appreciably with the exception of land use, cultural resources and biological resources. The alternative totally along the road right-of-way would have a negligible land use impact. The other nine would have a low impact as a result of disturbance of agricultural land.

Six of the ten buried cable alternatives have the potential for high impact to cultural resources. This is due to the documented presence of archaeological sites in the area which the cable will traverse and the high probability that these routes would destroy additional, presently unrecorded sites. The remaining four routes have been assigned a low or moderate impact, based on the lower possibility of

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encountering an archaeological site.

Seven of the alternatives would have impacts on biological resources because of the likelihood of disturbing critical raptor, riparian, or aquatic habitats. Four of the seven alternatives would have moderate impacts, while the other three would have low impacts. The differences are due to the expected frequency of encountering the critical habitats. These impacts were judged significant because of the limited areas of those habitats.

Environmental impacts of the staging area locations have been evaluated. A staging area may be established during deployment and would serve as a temporary field storage and administrative center.

The proposed action would have staging areas located on the Base, and in Cheyenne, Wyoming, and Kimball, Nebraska. An alternative would have temporary support areas only on the Base and in Cheyenne, Wyoming. Another alternative considers the possibility that no staging areas will be developed.

Impacts among the locations considered did not vary appreciably with the exception of transporation and cultural resources. Transporation impacts would be low for the proposed action, that includes a staging area in Kimball, because of the potential of condestion on community roads.

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Simiarly, impacts on cultural resources would be low for the proposals that include staging areas on the Base because of the presence of prehistoric and historic cultural resources.

Conclusion I. In conclusion, the Draft Environmental Impact Statement projects beneficial effects in employment demand, housing, public finance, construction resources, social well-being, transporation and land use. It further predicts, that without further mitigation actions, there would be significant adverse impacts in housing, social well-being, public services and facilities, utilities, transportation, recreation, water resources, biological resources and threatened and endangered species.

Mitigation I. To the extent practicable, standard practices that could avoid, reduce or eliminate environmental impacts were assumed in the assessment process. Additionally, mitigation measures could be used to reduce impacts that have been identified. The analysis conducted has identified many of the mitigation options that are available to reduce impacts. For example, these could include requesting funds through existing federal impact aid to school districts for Laramie County School District No. 1. The Department of Defense and Wyoming and Nebraska government entities have agreed to enter into a cooperative mitigation agreement which will set forth specific measures to be undertaken by the Department of Defense

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which will mitigate adverse impacts resulting from the project.

Future Activities I. The statements, comments and questions provided during the public hearings and written comments postmarked by November 28, 1983, will be analyzed. After the close of the comment period, the Air Force will review and evaluate all inputs to determine how they should be responded to and the need for revisions to the analysis contained in the draft statement. The completion of this work will result in the development of the final environmental impact statement to be released by January 31, 1984.

Written comments may be submitted at the conclusion of this meeting or mailed to the address on the screen. Written comments will receive the same consideration as those received verbally this evening. This completes the briefing portion of the hearing. I shall now turn the program back to Col. Smith.

COL. SMITH: Thank you very much. I think, because we have to make a few changes here on stage, we'll go ahead and take a ten minute break at this point. We'll return and then have statements, comments and questions from local officials and individuals and representatives of organizations. So, let's break for about ten minutes at this time.

(Statement - Col. Smith)

(Whereupon, a short recess was taken.)

COL. SMITH: We'll press on with the introduction of experts and specialists that we have here to respond as to your questions and comments this evening.

First we have the hearing team, Chief Lt. Col. Peter Walsh, Director of Environmental Planning Division Air Force Regional Civil Engineer's office, Norton Air Force Base, California; we also have Col. Warren Hickman, the Site Activation Task Force Director at F. E. Warren Air Force Base; next we have Lt. Col. Reese Padfield, who is the Assistant Chief of Environment and Integration Division of Missile Ballistics Office at Norton Air Force Base, California; we have Maj. Dave Taggart, the Staff Judge Advocate Air Force Civil Engineer's Office, Norton Air Force Base, California. we have Capt. Mike McMullen, Air Force Headquarters Peace Liaison, Cheyenne, Wyoming; we have Mr. Fred Hickman, the Human Resource Director, URS Berger, San Bernardino, California. we have Dr. Dick Kramer, who is National Resources Director for URS Berger, San Bernardino, California.

That is the team of people that we have here this evening who are knowledgeable concerning the project. I turn now to governmental officials.

We have with us this evening, Her Honor, Mayor of Kimball, Edith Haines. She's indicated t... she would like

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to make a few comments. Mayor Haines?

186 MAYOR HAINES: I really wanted to talk last, but I guess I'm going to have to start.

I have reviewed the impact statement and I guess that is what they want us to talk on. This statement was very beautifully done. I think they covered every area there is to cover. I can't say that I agree with all of it. I think the one area that they covered that I disagree with most is the population that they have said Kimball will have.

They are planning to bring in a few people. I think with an impact like this they will probably bring in more than they indicate, and in this study they indicate that the high school population would go down. Now, I think it's very unrealistic to think they are going to bring in some people and yet our high school will decrease. That was one of the major flaws that I found.

I think as far as the impact is concerned, any time you have a change you are going to have some kind of impact. It doesn't necessarily mean that it's bad. Some of this impact can be good; some of it probably will be a little tedious and a little harder to put up with. Perhaps there will be more transporation on roads and so forth. As far as the city is concerned, I think we can very well take care of any influx of population that comes in. I think also the

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(Statement - Mayor Haines)

impact that is going to be major is the impact on the farmers and the ranchers whose places the missiles are on. I think perhaps it's stunned and shocked us a little bit that there are probably nine families who may have to make some more adjustments to the MX or Peacekeeper.

I have written several letters. I wrote to James Boatright, who is the Assistant Secretary of the Air Force. I wrote to Senator Tower, who is -- I forgot his title now -- but he is on the Air Force Committee. I wrote to Virginia Smith and I wrote to Governor Kerry. I had a couple of alternate suggestions and I want them to look at a few things. Because plans were made does not mean that plans perhaps couldn't be changed just a little bit.

So it is up to our higher officials to look at things a little bit more.

As far as Kimball is concerned with the MX or the Peacekeeper, we have not fought bringing the MX into Kimball. I think most of the people here feel that they want a very strong defense. I also feel that people here feel that they have lived with the Minuteman missiles; they won't feel the Peacekeeper in these silos would be much more vulnerable than the missiles that we already have. I think I prefer to think of the MX or the Peacekeeper as kind of watch dog or a block from the door. It's too bad. It saddens me to think that the

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(Statement - Mayor Haines)

have need of any kind of missiles at all. We know that half a world away we have some missiles that are pointed at us. I'm sorry to say that we have to point missiles at them. But let us think a moment. If we took every missile out of our ground, would those missiles half a world away come down? Would they? How many of you have locks on your doors? How many of you lock your doors at night? How many of you have watch dogs? That's a little bit like what I think of a missile. We have had experience here. We have the Atlas which was built, a huge, big hole in the ground, just a few miles south of Kimball. It's laid in that hole for quite some time until it became too old to be useful and it was taken out. 103

We know that over the country we have had a lot of -- what's the one we have in our park? I can't think of it right now -- the Titan. All right. They are being removed too. Their usefulness is gone. We have lived with the Minuteman here for twenty years. It has laid in the ground, too, and hopefully I will hope that the Peacekeeper will also always remain in the ground, too.

Thank you.

COL. SMITH: Thank you very much, Ma'am.

The next card is -- well, first let me say that we will press on with statements from individuals and

(Statement - Col. Smith)

representatives of organizations. We do ask that you make an effort to limit your comments to five minutes. We have a microphone there in the center aisle, and we'll press on right with the first card that I have. That is Marian R. Lenzen, I believe is the name of the individual, of Sidney, Nebraska.

Good evening, Ma'am.

375 MS. LENZEN: Good evening.

My name is Marian Lenzen. I live on a farm near Sidney, Nebraska, in Cheyenne County. I acknowledge that the Air Force personnel are doing their duty in promoting selling the MX missile. I also am doing my duty, my patriotic duty as an American, when I fight the building and the deployment of the MX missile. Because my conscience, my intellect and my instinct demands it.

Just because the Scowcroft Commission composed a myth who have supported the MX from its inception they have recommended placing one hundred MX missiles in existing Minuteman silos, and President Reagan has rubber stamped this recommendation, Congress has reluctantly, by a House vote of 217 to 208 approved funding for the MX missiles, all that doesn't mean that the last word has been said on the MX. 104

All that has been proven so far is that it

(Statement - Ms. Lenzen)

Washington, D.C., the emperor always wears a full suit of clothes. According to the DEIS, the MX region of influence encompasses a 60 mile radius of Cheyenne, Fort Warren Air Force Base. It was stretched to include the metropolitan area of Denver, Colorado, but stops at Cheyenne County in Nebraska. That seems an arbitrary line to draw. Sidney is only 40 miles east of Kimball. You are expecting more immigrants, workers than there would be jobs for. I believe that some of those seeking jobs will spill over into the Cheyenne County area. Many will be practically destitute from the effects of Reaganomics. Americans who are good, hard working people out of work through no fault of their own; but nonetheless needing food, shelter, clothing, medical care, putting a strain on Cheyenne County and its resources. I believe that Cheyenne County should be included in your region of influence. 232

The DEIS states that the regional per capita income for 1982 dollars in the region of influence is projected without the MX and with the MX. The chart gives us those figures. Now, according to the chart the per capita income with the MX increases very little over what it would be without the MX. The 1984 per capita income is up by $6; and in 1985 by $50. That's the largest amount for any year. In 1987 by $7; in '87 by $2e; and in 1988 by $19; in '89 by 438

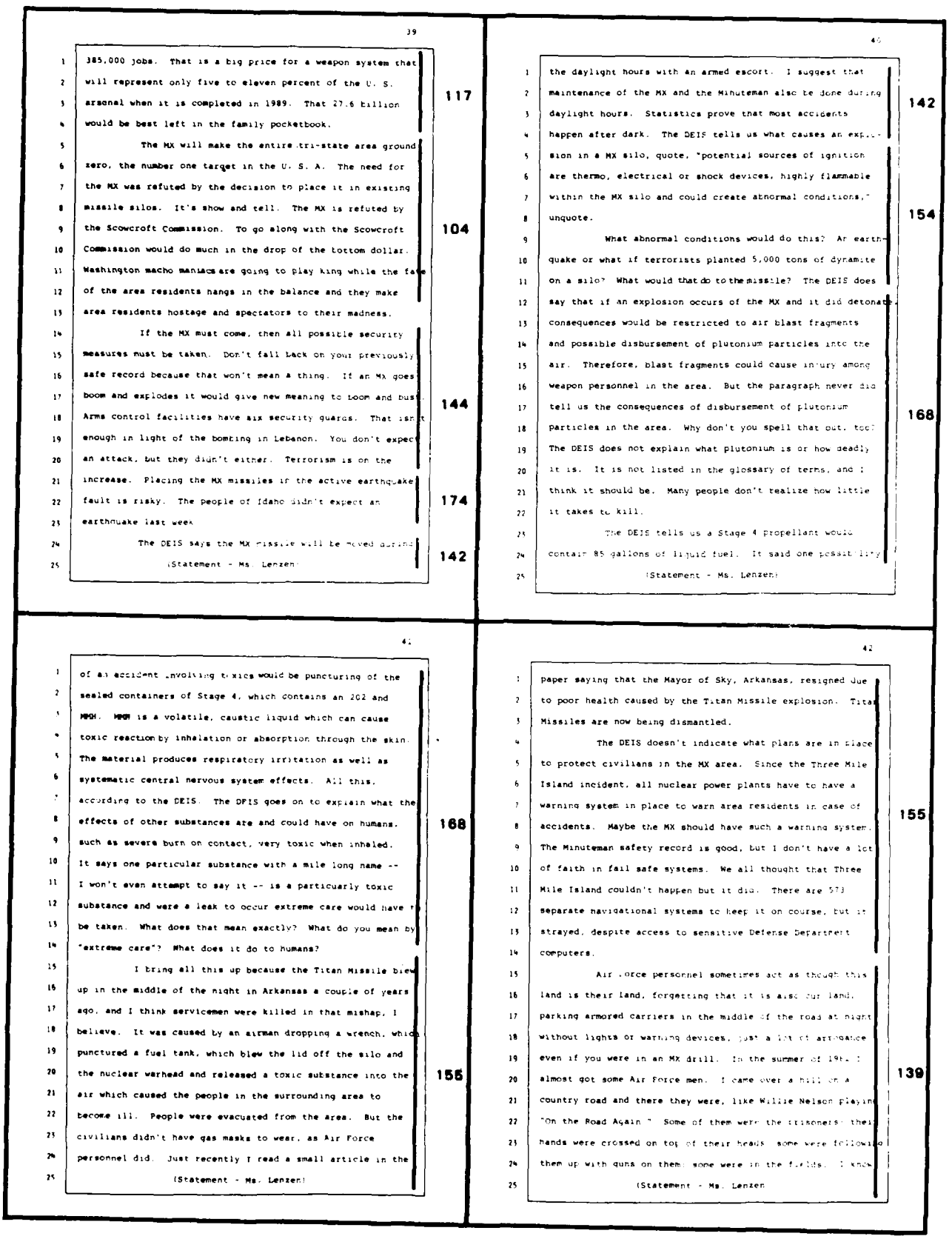
(Statement - Ms. Lenzen)

$6; in 1990 and 1991 there is no difference whatsoever. From this chart it would appear that the economics boom wouldn't be spread and wouldn't be great if it's spread evenly around. But, of course, it won't be spread evenly around. Some will prosper and some will pay. Those who will pay the most are those least able to fend for themselves. Local inflation will hit hardest those on fixed incomes, the elderly and the disabled. The same people who require the most medical care, they will find it harder to get it because there will be more people and the same number of doctors. Farm families will pay out of all proportion to their numbers. Nine as of now and the DEIS says this number is, quote, "conservative" meaning the number could increase dramatically. They will have to move or live in the restricted safety zone around the MX. I don't want to live within 50 miles of the MX. So I can't imagine opting to stay within the safety zone. But moving would be a very stressful experience. 438 487 185

Air Force personnel are used to being transferred around every three years. Farm families are not nomads. Many farm families live on the same land the same homestead that their great grandparents did. Their roots are deep. Moving will not be easy.

A recent study showed the MX will cost every American family over $400, and the nation as a whole 117

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385,000 jobs. That is a big price for a weapon system that will represent only five to eleven percent of the U. S. arsenal when it is completed in 1989. That 27.6 billion would be best left in the family pocketbook.

The MX will make the entire tri-state area ground zero, the number one target in the U. S. A. The need for the MX was refuted by the decision to place it in existing missile silos. It's show and tell. The MX is refuted by the Scowcroft Commission. To go along with the Scowcroft Commission would do much in the drop of the bottom dollar. Washington macho maniacs are going to play king while the fate of the area residents hangs in the balance and they make area residents hostage and spectators to their madness.

If the MX must come, then all possible security measures must be taken. Don't fall back on your previously safe record because that won't mean a thing. If an MX goes boom and explodes it would give new meaning to boom and bust. Arms control facilities have six security guards. That isn't enough in light of the bombing in Lebanon. You don't expect an attack, but they didn't either. Terrorism is on the increase. Placing the MX missiles in the active earthquake fault is risky. The people of Idaho didn't expect an earthquake last week.

The DEIS says the MX missile will be moved during

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the daylight hours with an armed escort. I suggest that maintenance of the MX and the Minuteman also be done during daylight hours. Statistics prove that most accidents happen after dark. The DEIS tells us what causes an explosion in a MX silo, quote, "potential sources of ignition are thermo, electrical or shock devices, highly flammable within the MX silo and could create abnormal conditions," unquote.

What abnormal conditions would do this? An earthquake or what if terrorists planted 5,000 tons of dynamite on a silo? What would that do to the missile? The DEIS does say that if an explosion occurs of the MX and it did detonate, consequences would be restricted to air blast fragments and possible disbursement of plutonium particles into the air. Therefore, blast fragments could cause injury among weapon personnel in the area. But the paragraph never did tell us the consequences of disbursement of plutonium particles in the area. Why don't you spell that out, too? The DEIS does not explain what plutonium is or how deadly it is. It is not listed in the glossary of terms, and I think it should be. Many people don't realize how little it takes to kill.

The DEIS tells us a Stage 4 propellant would contain 85 gallons of liquid fuel. It said one possibility

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of an accident involving toxics would be puncturing of the sealed containers of Stage 4, which contains an 202 and MMH. MMH is a volatile, caustic liquid which can cause toxic reaction by inhalation or absorption through the skin. The material produces respiratory irritation as well as systematic central nervous system effects. All this, according to the DEIS. The DEIS goes on to explain what the effects of other substances are and could have on humans, such as severe burn on contact, very toxic when inhaled. It says one particular substance with a mile long name -- I won't even attempt to say it -- is a particularly toxic substance and were a leak to occur extreme care would have to be taken. What does that mean exactly? What do you mean by "extreme care"? What does it do to humans?

I bring all this up because the Titan Missile blew up in the middle of the night in Arkansas a couple of years ago, and I think servicemen were killed in that mishap, I believe. It was caused by an airman dropping a wrench, which punctured a fuel tank, which blew the lid off the silo and the nuclear warhead and released a toxic substance into the air which caused the people in the surrounding area to become ill. People were evacuated from the area. But the civilians didn't have gas masks to wear, as Air Force personnel did. Just recently I read a small article in the

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paper saying that the Mayor of Sky, Arkansas, resigned due to poor health caused by the Titan Missile explosion. Titan Missiles are now being dismantled.

The DEIS doesn't indicate what plans are in place to protect civilians in the MX area. Since the Three Mile Island incident, all nuclear power plants have to have a warning system in place to warn area residents in case of accidents. Maybe the MX should have such a warning system. The Minuteman safety record is good, but I don't have a lot of faith in fail safe systems. We all thought that Three Mile Island couldn't happen but it did. There are 573 separate navigational systems to keep it on course, but it strayed, despite access to sensitive Defense Department computers.

Air Force personnel sometimes act as though this land is their land, forgetting that it is also our land, parking armored carriers in the middle of the road at night without lights or warning devices, just a lot of arrogance even if you were in an MX drill. In the summer of 19[illegible] I almost got some Air Force men. I came over a hill on a country road and there they were, like Willie Nelson playing "On the Road Again." Some of them were the prisoners: their hands were crossed on top of their heads, some were following them up with guns on them, some were in the fields. I know

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they were playing war games, but I almost hit those guys because I came over the hill and there was no warning whatsoever that they were going to be there. I stopped in time and I was very greatly relieved. But that really soon turned to anger and I'm still angry when I think about it because those roads are my roads to use, just the same as they are your roads to use. 139

Last but not least, I object to the reasons given in the DEIS as to why the impacts of nuclear attacks on the MX wasn't made. The reason because the effects of nuclear war are speculative. If that's the case, the effects of nuclear war have been documented by Hiroshima, Nagasaki and nuclear tests have been made on Pacific Island and the results have been documented. The Office of Technology assessment has recorded the effects of nuclear war. Many books have been written on the subject, yet the DEIS says the effects are speculative. I think that's nonsense. What is speculative is the accuracy of the MX. No missile has been fired over the North Pole at a target. No one knows for sure how accurate the MX will be. That's speculation. Expensive speculation at that. The Pentagon never likes to talk about what it will do. But the public would like and would demand no more nuclear weapons. 37

Thank you.

(Statement - Ms. Lenzen)

COL. SMITH: Thank you very much, Ma'am.

We do have about twenty cards, so I would ask people to try and limit their comments to approximately five minutes so that we can get as many as we can before the end of the hearing.

The next card that I have is Dr. Ira Helfand, who is representing the Physicians for Social Responsibility.

Dr. Helfand?

285 DR. HELFAND: Thank you.

Physicians for Social Responsibility is an organization of medical doctors around the country which are concerned with the medical consequences of nuclear war. There are 20,000 of us from coast to coast, and we try to spend as much time as we can -- we take time from our practices -- to educate the public about the consequences of nuclear war

I'd like to come back to the theme that was struck by the last speaker. This glaring omission in the DEIS report on the actual consequences of nuclear war. What would happen if these weapons are used, as the speaker indicated? This is not a speculative matter. We can't be certain exactly what will happen, anymore than we can be certain what will happen to the Colorado Butterfly Plant. But there is enormous body of material that tells us what we can reasonably expect if the MX missile is used. 37

(Statement - Dr. Ira Helfand)

It is your right to have information and it is the responsibility, or should be the responsibility of the Air Force to provide it to you as part of their impact statement. That they haven't, I think, is really quite unacceptable. 37

I would like, therefore, to briefly summarize the highlights of what we know about what would happen if an attack occurred, and if the MX missile were used.

First of all, it is important to understand what has been pointed out that the deployment of the MX will make this area the highest priority military target in the free world. It will take precedence over Washington, D. C., it will take precedence over New York City. It will become the primary first target. The reason for that is that this weapon, the MX, has been specifically designed to be able to attack and destroy the Soviet missiles. In an attack if the Soviets chose to launch their missiles, the United States would have to have, as its first target, the destruction of these weapons. 104

Each of the one hundred missile silos would be attacked with at least two warheads. They range in size from 600 kilotons to one megaton. One megaton is approximately 600 times the size of the bomb that destroyed Hiroshima. A total anywhere from ten to 15,000 megatons would be detonated over the Panhandle Region and southeast Wyoming.

(Statement - Dr. Ira Helfand)

We can look at this perhaps more clearly by assuming that all of the fire power is concentrated in 620 megatons. I just want to give you a clear idea of what kind of destructive forces that we're talking about. A 20 megaton bomb that went off over this town would, within a thousandth of a second, form a fireball four miles across. Within that fireball the temperature rises to 20 million degree Fahrenheit. Everything on the ground beneath the fireball -- trees, livestock, people -- would be vaporized. To a distance of six miles in every direction from the center of this explosion, the heat would remain so intent that automobile sheetmetal would vaporize, glass would melt. To a distance of ten miles in every direction the heat would still be so intense that sheetmetal would melt. At this distance the force from the blast will generate winds in access of 200 mile per hour. Everything that was not made out of reinforced steel or concrete would be flattened To a distance of fourteen miles in every direction from the center of the explosion the temperatures generated from the blast would be so intense that everything flammable would burst into flames -- crops, heating oil, glass, diesel fuel, paper, wood, clothing -- if all these fires happen during growing season, it would converge into a fire so complete that it would destroy the entire area. Fifteen miles, or 104

(Statement - Dr. Ira Helfand)

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fourteen miles, in every direction. Twenty-eight miles across would be consumed by flames. Beyond the fire storm, the destruction would continue to a distance of twenty-one miles in every direction from the explosion. The pressure from the blast would still be two pounds per square inch. That's not enough to do a lot of structural damage to a building, but it is enough to shatter a glass and turn hundreds of shards flying outward between the center of the explosion at speeds in excess of one hundred miles per hour. To a distance of twenty-eight miles in every direction from the center of the explosion heat would be so intense that anyone who is outside whose skin is not completely protected by clothing or some other kind of barrier would be subject to third degree burns over all of their exposed skin. To a distance of thirty-two miles from the center of the explosion all exposed skin would be subject to second degree burns, and to a distance of forty to fifty miles in every direction from the center of one of these explosions everyone would turn to see the reflection of the sudden flash of light and be permanently blinded instantly. The effects of nationwide nuclear war between the United States and the Soviet Union are similarly documented. The Pentagon's working model for total nuclear war is called CR2-B. 6,559 megatons of nuclear explosives were detonated over the United States. That is

(Statement - Dr. Ira Helfand)

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equivalent to 524,000 of the Hiroshima sized bombs that were detonated on the continent of the United States. In less than half an hour the death toll due to the attack would be six million people killed. It would be expected that within the next month that the one hundred million Americans remaining alive, that forty million would suffer major injuries; sixty million would have lesser injuries. This is only the most direct consequences of nuclear war. It does not take into account the effects of starvation, of radiation sickness, of epidemic diseases that undoubtedly would decimate the surviving population. It does not take into account the fact that the entire economic structure would be destroyed. It does not take into account the extreme environmental and ecological effects, which we are only now beginning to understand.

A recent conference last week in Washington, D. C. has suggest that a war on this scale would blow so much smoke into the air that the entire earth would grow dark and that over the entire northern hemisphere the temperature would be fifty-five degrees for three or four months at least. That means if it took place during the summertime, you would have a second winter. All the crops and the plants and all the animals would die. These kinds of effects are perhaps somewhat speculative. The others we've talked about

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certainly are not. They're well documented. This is information that I indicated is yours. It should be yours. It's your right to have it before you make your decisions.

Now, the Mayor said before, and I certainly agree with her, that we need to have a strong defense. I think it's particularly important for us to understand that the MX does not contribute to our defense. We have right now the ability to deliver 10,000 nuclear warheads on the Soviet Union. We can destroy that society as thoroughly as they can destroy us. We do not need more weapons to assure that destruction. The MX missile is specifically designed, not as a deterrent weapon, but as a first-strike weapon. It was designed to attack and destroy the Soviet missiles before they're launched in their silos. This is how it was understood by the Carter administration and the administration realized how important this is. This is how it is understood by the Soviet Union. The implication is very important because what it means is that if we deploy the MX, a force capable of destroying the Soviet missiles in their silos, the Russians are going to have new incentives to launch those missiles. At a time of international crisis, when we fear war might break out, is precisely this effect which theoretically destabilizes the arms race and leads us to Armageddon. The MX missile does not contribute to our defense.

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It undermines our security and should not be deployed.

Thank you.

COL. SMITH: Thank you, sir.

The next card that I have is Martha Lukessen.

376 MS. LUKESSEN: I'm the mother of Glenda Parsons. I'm not able to stand up, but I would like to state why --

CAPT. McMULLEN: We will bring the mike to you.

MS. LUKESSEN: I'm not going to say very much. They say our best weapon is food, and why with so many Minuteman missiles do they have to place this one by my daughter's home where the house cannot be moved without totally wrecking it. There is a lot of farm buildings, big buildings, that are used for mechanics to work also for cows calving. How could they drive a long distance in the middle of winter to take those calves, which my daughter has done, and it has caused her a great deal of trouble. I don't see why this missile can't be put in someplace else when there is so many Minuteman missiles.

COL. SMITH: Thank you, Ma'am.

MS. LUKESSEN: It was a gift to her from her parents who won't be with us very long.

CAPT. McMULLEN: I certainly want to say that we appreciate your comments, and I have visited with your

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daughter on three occasions now and discussed various questions and, hopefully, thoroughly explained what this safety zone issues is all about.

First of all, I think we recognizes it, but for the edification of all of us here, it is something that is not definitive yet. That is, we are proposing an increase to the current safety zone, which is 1,200 feet around the existing Minuteman silos. We may have to increase that about 550 feet, according to our technicians. We are going to evaluate that through a series of tests and anlaysis that will be performed outside of the state. That would be concluded in the spring of 1984; however, you must understand that it is not the intent of the Air Force to force people to move, and that is precisely why we have offered exemptions to the safety zone rules and we feel confident that in doing that, because of the reliability of the safehood of those propellants, that are in the -- not only in the Minuteman system but in the soon to be MX system. The Titan missile that was described earlier in the evening was strictly liquid propellant fuel, highly volatile and very dangerous, and the old missile part of that was the reason why we chose to dismantle it, and that when that accident occurred, because of that highly volatile liquid propellant, it did blow the reentry system top and the side of the missile off and out

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into the area. Yet there was no contamination or leakage of the warheads that were on that reentry system, and that's a very old system and we have taken great measures in improving those, not only the warheads, but the propellant. This missile is -- the MX missile -- is a three-stage solid propellant fuel of the same type that's in the Minuteman. We've never had an accident in the Minuteman. There is some liquid propellant in the time stage. It's sealed separately. It's a hyperbaric fuel, which is mixed as the missile flies down range and then combusts.

I just want to point out those things to show your daughter and to illustrate the safety of the current MX. Now, I will address your pertinent question about why can't we consider moving the missile to another silo so as not to impact your daughter's property or her, in fact, effect her habitat, her house. She does have a lovely house. I've been there and talked to her about this. The answer to that is that there are two possibilities. One, we could move the missile to another silo that did not have an inhabited structure by it; or two, we could relocate the silo.

Let's take the first one. We have a technical problem with trying to move the missiles. With the advent of the MX and part of the decision to deploy it, one hundred of them was to integrate them electronically for a more

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redundant, commanding control and communication capability. Now, in order to do that we have to have all the missiles close together and in what we call squadrons. A squadron is fifty missiles and they have -- they are electrically interconnected, and then we have another fifty miles and another squadron and they are all electrically interconnected. We want to connect those two squadrons together and minimize the impact and additional land might be required. If we were to scatter them all over, we would have to tear up significant amounts of land in order to electrically interconnect them or isolate them. It could be very complex and very technically difficult and very costly. In doing so, we would possibly affect more landowners and inhabitated structures by doing that.

Now, the second part is why can't we dig new silos elsewhere outside of, or farther away from her house. Unfortunately, politically we're constrained from doing that. The administration has agreed to do nothing to undercut the terms of the existing Arms Control Agreement, Salt II. One of the existing Arms Control Agreement, although unratified. The administration has taken the position as an existing agreement to not undercut one of the provisions in the Arms Agreement. That agreement states that we cannot relocate -- neither side, the Soviet Union or the U. S. --

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can relocate their existing, fixed, land based ICBM silos. We're really in a dilemma. But it reenforces that option that is available to her. I think she clearly understand that now and, granted, she was upset when we first contacted her the other day. She commented, you know, "I really was upset when you first talked to me, but I thought this thing through and I'm no longer upset. But I do have a lot of questions."

We're pursuing the answers to her questions.

MS. LUKESSEN: We also found out that the insurance companies will not cover any damages done by the Air Force or the missiles.

CAPT. McMULLEN: But we will. I don't know if everybody heard that question.

She contacted some insurance companies and they said they would not cover any damage resulting from an accident caused by the Air Force or Air Force Missile Systems, correct?

Is that your question?

MS. LUKESSEN: Yes, and also they --

CAPT. McMULLEN: Can I just respond to that question because they didn't hear.

The insurance company may not be responsible for that, but the Air Force would be liable for that. If she

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chose the exemption option and stayed there, we would be liable if any accident did indeed occur.

MS. LUKESSEN: Now, they say an earthquake will set those off. 174

CAPT. McMULLEN: Col. Padfield is the expert in that area and has done some study and certainly he could address that question, if you would like us to address that.

LT. COL. PADFIELD: We know that some of the missile sites are in a zone that the Geological Survey says is active. When those original sites were surveyed, we did seismatic activity tests and core drilling. The sites were designed to take environment much more severe than we see the seismic activity in the zone, which we live in here. We have tested the shock isolation system. That's the system that holds the missile and the cannister away from the silo walls. We have tested that to the seismic activity and we expect to see this in California, because we will be placing some of these missile for test shots in front of Vandenberg Air Force Base. The results we get from these anlayses showed that the shock system will respond to those seismic activities, but that response is negligible compared to what it's designed to take to its original specifications.

MS. LUKESSEN: Would you build her another house or outbuildings? 185

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CAPT. McMULLEN: The option is avilable to her to sell the house itself to the Air Force and use those proceedings to buy another house elsewhere, or she can sell the house and the associated farm property, which would include her outbuildings, to the Air Force.

MS. LUKESSEN: That's going to be -- there's a lot of big buildings there. That's a big expense.

CAPT. McMULLEN: It could be a big expense.

MS. LUKESSEN: It would be easier to move the missile.

CAPT. McMULLEN: Well, rather than repeat myself on the explanation of why we can't move the missile, it's certainly something that we have looked at from a technical and political standpoint, and we're caught in a dilemma.

MS. LUKESSEN: She has a lovely grove of trees around there and you couldn't move the trees very easily. It takes a long time to get trees like that. 185

CAPT. McMULLEN: You are absoluutely right.

COL. SMITH: Thank you very much, Ma'am.

The next card that I have is that of Rev. Steve Sidorak, Colorado Council of Churches.

Rev. Sidorak?

258 REV. SIDORAK: Thank you again, Col. Smith.

(Statement - Rev. Sidorak)

I would like to read into the record for the people here a statement that was signed by forty-two religious leaders representing eight western states, including thirteen bishops, executives from Nebraska, and eleven bishops and executives from Wyoming, the two states for the proposed deployment of the MX missile.

The following statements issued in an unprecedented news conference in Cheyenne, Wyoming, on June 3rd of this year. It's important and significant to note that never before has so many religious leaders and so many churches gathered together at one time and at one place to address a single issue, the Western United States. Signatories to the following statement sympathize with the widespread moral opposition to the MX deployment which exists among religious leaders and religious people of the mainline Christian Churches of the Western United States, and under scores the difficulties religious leaders are confronted with in any attempt to reconcile the preparation for nuclear war with the Christian faith. Consequently, the significance of the following statement cannot be underestimated. I will read this into the record and then I have ten questions for the panel that I hope will be incorporated into the response. I will be brief.

"We the undersigned leaders of the Christian 104

(Statement - Rev. Sidorak)

community with regional responsibility serving the western states of the United States do hereby express our opposition to the testing, production and deployment of the MX missile system. Our conclusion is based on the Biblical record, the tradition of our churches, the common, moral concern over the ever escalating nuclear arms race. We want you to know that our opposition to the MX missile is not limited to possible deployment in the Nebraska and Wyoming area, but extends to any proposed deployment anywhere in the United States.

"There are any number of reasons for opposition to the MX missile system, including strategic, economic, environmental and sociological problems. Yet our main reason for opposition is our moral disagreement with the nuclear policy which states the deployment of any weapon system that boasts a first strike capability and thereby forebodes abandonment of the document -- deterrents -- furthermore, the moral reflection is misleading, and the realization that its deployment could indicate the adoption of a launch-on-warning strategy, which would only lower the threshold of nuclear war and increase the likelihood by design or accident. Such situation represents the moral nightmare of our nuclear predicament. In such situations the just war becomes problematical. 104

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"We also want to express concern over the budget priorities. Our sense of stewardship is disturbed by the inordinate amount of spending at the expense of human need. We simply cannot tolerate budget priorities which deprive human beings basic needs. Our vision of Shalom is a vision of well being for all God's creatures. We prefer the economy of life over the economy of death.

"We recognize moreover that the defense and national security cannot be written strictly in military terms; therefore, with one faith, one voice, we, the undersigned religious leaders, state our moral opposition to the deployment of the MX missile system. We call upon the leaders of the United States and all members of the U. S. Congress to stop funding for testing for the MX immediately.

"Finally, we lend our support to any serious effort to halt the negotiating reductions in the arsenals of all nuclear nations."

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Question One: Does the Scowcroft Commission report contradict its recommendation of moving, quote, "towards reducing the value and importance of individual strategic tarets," unquote. Also, recommending at once deployment of the MX in fixed, vulernable silos, a more valuable and important individual strategic target then the MX.

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Question Two: Is the MX, by any stretch of the

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imagination, based in fixed silos survivable?

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Question Three: Does the Air Force contemplate a Minuteman missile system in the near future; and if so, how many missiles will there be and when will that be deployed, and will there be demands in the control of communication of Warren Air Force Base and what other impacts could occur in Nebraska and Wyoming because of the Minuteman missile deployment in these two states?

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Question Four: Is the deployment of a ballistic missile defense on top of the MX missile absolutely precluded by the recommendations of the Scowcroft report, and if not, would not the deployment in Nebraska and Wyoming as well be under the command of F. E. Warren Air Force Base?

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Question Five: How can the MX missile, in and of itself, be defined as, quote, "defensive" unquote, when it has no, quote, "defensive" unquote, characteristic whatsoever? It is uniquely offensive, and not only morally.

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Question Six: Why does the Air Force refuse to hold its DEIS hearings in Colorado when the DEIS indicates that there will be, indeed, impact upon Colorado?

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Question Seven: What will these effects of a Soviet first strike against the MX missile system, once it is deployed in Nebraska and Wyoming -- if it ever is deployed in Nebraska and Wyoming -- be; and why does the Air Force

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(Statement - Rev. Sidorak)

choose not to address itself to this most potentially dramactic impact, and why do you and the DEIS consider the effects of a nuclear war -- our limited first strike against the MX -- that's simply speculative and, therefore, something that cannot be addressed systematically?

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Question Eight: Since when, and by what slight of hand, has counter force strategy become synonymous with deterrent strategy?

Question Nine: With all due respect to local, elected, political leadership, since when was the job of the Mayor of Kimball -- when she was talking about the Minuteman -- we are faced with new weapons being deployed in its backyard -- to become the policy for nuclear war? Who else betrays the gross unfamiliarity with critical facts like the difference between the Minuteman missile and the MX missile? It is not just a new missile in an old hole.

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Question Ten: Does the panel feel they are dealing with relatively uninformed local residents and can therefore play fast and loose with facts of nuclear policy and nuclear weaponry -- and do so in a patronizing PR style?

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COL. SMITH: Any questions from the panel?

CAPT. McMULLEN: Steve, I apologize, I did not get all of your questions. Let me address those I did get. If you would like to have them answered tonight or

(Statement - Rev. Sidorak)

we can respond in writing.

REV. SIDORAK: I'd prefer that they be responded to in the report, the revised DEIS.

CAPT. McMULLEN: That's fine. We'd be happy to do that for you, sir.

REV. SIDORAK: Thank you.

COL. SMITH: The next card that I have is that of Bill Batterton of Kimball, Nebraska.

Good evening, sir.

334 MR. BATTERTON: I want to address the possible impact on one of your recreation areas from the people that may be living in our area or in Cheyenne or Pine Bluffs or Harrisburg or Scottsbluff, wherever it might be.

We have a unique situation whereby about eight years ago the people in this tri-state area decided that they wanted to make a constant level water pool on the lake out here just about ten miles this side of the Wyoming line. This group of people in this tri-state area raised enough money to get the project started, which was $110,000, and outright donations, no tax dollars involved. Of that $110,000, about $10,000 of it came from Wyoming to show the support that they get from that area to have a constant level lake with all the recreational facilities that go with water.

(Statement - Bill Batterton)

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Since then, the lake was built; the dike was built; all of the facilities were beginning to form, and in 1981, we filled it up with water. In 1982 we were planning on having the State Game and Park take over the project, as it had become a monster to take care of through volunteers going out there to clean up the trash, trim the trees, water the trees. All through this time, volunteers went out there day after day, thousands of dollars by volunteered people, thousand of hours of donated labor, and they built the ramps for the boats, the docks to fish off of, the entry way into the lake, the roads and planted trees. It was all volunteer money and labor.

In 1982 we hoped for the State of Nebraska to take the project over. The Governor at that time elected not to fund the project. So it's remained as it is, now owned by the local Natural Resource District, and supported by the three counties of Dewell, Cheyenne and Kimball Counties. Of course, don't confuse Cheyenne County with Cheyenne. It's Cheyenne County, Dewell County, Kimball County. These three counties are the taxation entity that supports that lake and the whole recation area. Any impact is going to cause additional work to be done out there to clean up trash, keep the restrooms clean, mow the weeds, mow the grass, keep it in nice condition. There is a lot of room if all the

(Statement - Bill Batterton)

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weeds were mowed out there, there would be room for everybody, and the motto for this thing has always been, "Something for everyone," and we still want the general public from all over the United States to come, and they are starting to do that.

With this thing being on three years old, it's hardly on the maps and some of the publications that are out for recreation purposes, camping, campers, overnight stays and so forth. Some of the restrooms that have just been completed a year ago, some are going to be completed in the next few months. So we do welcome everyone, but any kind of impact of additional people is going to cause a strain on us.

Now, in 1983, again, we wanted the state to take over the project and again the Governor turned it down, saying that the state could not financially take over new projects. They were having enough trouble maintaining the ones that were already in existence. So this local Natural Resource District is still stuck, along with all of the volunteer people, and if I could impress upon you the number of people, hour after hour, machine after machine, donated go out there and get this work done: to make a pleasant place for the general public: to have recreation. We did get some federal funds in the beginning, and it was based on a

(Statement - Bill Batterton)

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fifty-mile radius that would be using it the most. That takes into account Cheyenne, Wyoming, at least the east end of it if you want to get technical.

So, I feel, and no, that as soon as the word gets out that this is such a lovely place to spend nights camping, it will be used overnight and daily, and of course, particularly on holidays; and I feel that we need some assistance along the way or we cannot support it and can't keep it cleaned up and maintained properly for the general public, and to do right by the people already around this territory that have put in so much of their own private donated money. And last, I do support the President of the United States and his tactical and military plans through strength.

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(Applause.)

MR. HICKMAN: I would just like to briefly comment on the situation which you are describing. Although the Oliver Reservoir South Platte District is not mentioned specifically within the DEIS, it was one of the many recreation areas that we looked at within the six county area for the deployment of the Peacekeeper system. The analysis itself was done within a separate document, the Wyoming-Nebraska Socioeconomic Study, which is now a part of the technical reports for the DEIS.

(Statement - Mr. Hickman)

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In looking at the Oliver Reservoir, we certainly saw it, although there aren't a great number of records available at this point, as one of the potential and growing recreation areas within the state, and certainly within the region. I think, as you pointed out, that it's going to be a very attractive place for all types of recreation. We recognize at the current time that it has virtually no staff and is beginning to have problems with maintenance and other upkeep as well as providing the facilities. We did, within the study itself, project overall, both for baseline through 1992, and then with the project, the use of all recreation areas within approximately a 100-mile radius of Cheyenne. That certainly includes this district as well. With those projects we saw increases in recreational activity by activity days for each of these separate types of recreation. We did not, at this point, specifically identify that area as within this radius, actually within specifically -- the Oliver Reservoir would receive a significant increase in use based on the project alone; however, we do recognize that it's going to receive an increase not only from the project, but from the growing population within the region.

What I would say is that one of the many mitigation measures we have proposed within the area of recreation, we

(Statement - Mr. Hickman)

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have seen the need to monitor the use of all the major recreation areas, and to see that if the use of the areas, if the preservation of the recreation in the areas, is such that additional mitigative action is necessary in the form of equipment, personnel, facilities or maintenance, that that be taken into account of other mitigating measures: that is, corrective mitigating measures, be put in place so, we have looked at the situation. We see it certainly as one of the areas which will receive additional activity, and we would suggest, within our document, that it be constantly monitored to see what changes do take place.

MR BATTERTON: Thank you.

COL. SMITH: The next card that I have is J. Wayne Robbins, representing the Panhandle Military Affairs Committee.

282 MR. ROBBINS: I would like to thank everyone for coming tonight. America needs your support more now than ever. We have had Minuteman missiles in Kimball for the last twenty-five years, and excellent relations with our Air Force, and no major problems. I believe in peace through strength.

In the past year, the Russians have produced more MX Peacekeeper missiles and better warheads than are planned to be deployed over our entire MX Program.

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Yuri Andropov made this statement November 12, 1982. "We know well that imperialists are not asking for peace. Peace can be defended only by relying on the imperialists' might of the Soviet Armed Forces."

Human life does not mean anything to the Russians. It means everything to the Americans. Our President and our Armed Forces have kept us free for over two hundred years. The system is working, and we need to stay with it and support it and them in their undertaking. I think the majority of Americans believe in four things: We believe in God; we believe in peace; we believe in freedom; and we believe in liberty. None of these things are permitted in Russia. We don't have to apologize to any country in the world for staying strong or rescuing our fellow Americans when they are held hostage anywhere in the world. We need the media to list some of the positive things in this country instead of anti-this and anti-that everyday. We have the greatest country in the world. The President did more this week by rescuing our people in Grenada, or Granada then all the MX missiles. He showed his resolve for his country and his people. We didn't show ours. We need to show ours with him. As long as we do this, I think we will have peace. We dare not, and cannot, let Russians take us by default, like they have done to the rest of the world. It is the

(Statement - J. Wayne Robbins)

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duty of every American to support their country.

In closing, I was in Russia in July of this year, and in talking to the few people I did, I think they would give anything they had to live in this country. We need to support this country and we'll always have peace.

Thank you.

(Applause.)

COL. SMITH: Thank you, sir.

The next card that I have is that of Monica Kirk from Kimball, Nebraska.

Good evening, Ma'am.

364 MS. KIRK: Good evening.

I'm an attorney practicing in Scottsbluff. Secondarily, I'm training as a biologist. What I've done is reviewed the biological endangered and threatened species part of the DEIS. This buzz really bothers me. Can your technicians take care of that?

CAPT. McMULLEN: We're having a difficult time hearing you up here too.

COL. SMITH: Step closer.

MS KIRK: Will that take care of the buzz? I still hear a buzz. I'll go ahead with what I said.

I'm an attorney and practicing in Scottsbluff. I've been trained as a biologist and I will address my

(Statement - Monica Kirk)

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remarks to the inadequacies of the DEIS as regards NEPA: particularly with respect to the biological resource section document.

The first thing is that it has been pointed out by several people who have already preceded me tonight that the document does not disclose adequately the full scope of the project. The Scowcroft Commission said, in its recommendation, that we need one hundred Minuteman or MX's placed in Minuteman silos. But we also need to investigate super-hardening and ABM systems. The attorneys on the panel realize that the National Environmental Policy Act, NEPA, does allow for tiering; meaning that there can be additional evaluations done at a subsequent date should the project expand. But that's only allowed when there is full and adequate disclosure the entire scope of the project initially.

If the Air Force does envision any of this in the foreseeable future, albeit they die. But it was the recommendation that has been issued by the Scowcroft Commission of remote possibilities that there is deployment plans for an ABM or super-hardening. Those issues must be included in the DEIS and the impact must be evaluated at this time.

Secondly, there is a fundamental requirement of NEPA and the accompanying regulations which were promulgated by the Council for Environmental Quality. That is, that

(Statement - Monica Kirk)

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alternatives be reviewed. Lt. Col. Walsh discussed the -- I guess it was Lt. Col. Walsh, whoever gave the remarks initially -- discussed the no-action alternative. For anyone who is familiar with NEPA, CEQ regulations -- to believe that the DEIS adequately discussed the no-action alternative is hard to believe. The no-action alternative discussion is a no-action alternative and requires more than just a statement that if there is no action, that nothing will happen. That's essentially the only conclusion that was drawn throughout the DEIS. So that there hasn't been -- the DEIS does not adequately address what action means. 76

Another alternative must be addressed. That is deferred action. That's always required by regulation, and it would be indicated in this case; particularly under case law where they require deferred action alternatives; wherever it is apparent that scientific or technical expertise may be available in the future to more adequately predict trade-offs and impacts. The deferred action alternative is not addressed anywhere in the DEIS. 78

The primary purpose of the Environmental Impact Statement, according to NEPA, CEQ regulations, is to serve as, quote, "Action forcing device to insure the policies and goals of the National Environmental Policy Act are enforced end of quote. The DEIS must provide -- this is mandatory. 77

(Statement - Monica Kirk)

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It's not permissive language. It must provide a full and fair discussion of the significant environmental impact so that the public is informed of what the consequences will be.

The DEIS is more than just a disclosure document. It's more than just a justification for the proposed selection action. But this DEIS doesn't adequately disclose impact, and what I learned today in my practice is that the husband of a woman I represent in a divorce has been employed as a construction worker on the MX project in Cheyenne, which suggests to me that the DEIS process is no more than just an attempt to justify what's already been started. It is no more than just an attempt to justify the action. It's already -- not only been proposed -- but what's been undertaken. 77

Another failure of the DEIS is in regard to the discussion of the production itself. The DEIS does not vigorously and fully and candidly disclose the impact on the biological resources of deployment. Perhaps the most glaring deficiencies of the DEIS is its failure to identify and to describe and to evaluate and appropriate the monitoring and enforcement program which is expressly required by the regulations. 53 1404 38

There are three essentials to a successful monitoring program. The reason we need a monitoring program is to

(Statement - Monica Kirk)

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determine at that point in time when the project impacts are exceeded by the agency action and the agency action needs to be stopped. There are three essential monitoring programs, and that would be a standard that's reliable and identifiable; that can alert the agency and the public to the -- and the contractors who are doing the work -- to circumstances which would indicate deployment activities must stop because they have exceeded acceptable impact levels. The monitoring program must also have -- serve as a means -- or it must include a statistically reliable procedure for measures or perimeters so that everyone will know when a standard is exceeded. 38

Finally, it has to include an enforcement component so that deployment can actually be stopped once the perimeter is exceeded. Admittedly, the DEIS does discuss very generally proposed mitigation measures. It does not identify any program of enforcement or compliance or monitoring. That is a significant deficiency.

The DEIS also -- or the agency in it, the Air Force -- is always required by NEPA and regulations to comply with the Federal Conservation Statutes. A close reading of the biological section of the DEIS, and also threatened and endangered species, indicates that was not done. Section 7A of the Threatened and Endangered Species Act places a 1405 1436

(Statement - Monica Kirk)

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three-fold burden on the agency. It has to carry out the conservation programs and must insure its activities will not jeopardize continued incidents of threatened and endangered species, and it must insure that the activity does not result in destruction or adverse modification of critical habitat. Throughout the report it's identified that significant habitat impacts will occur. There is nothing in the DEIS to explain what mitigation factors or plans are going to benefit and insure that that does not occur should deployment ensue. 1436

COL. SMITH: Perhaps if you could summarize because we are running beyond your time, please.

MS. KIRK: I think one reason that the agency ran into problems in developing the biological analysis is because they failed to employ Nebraska biologists and they used California scientists. I understand, and I agree, that scientists are trained in California and can be thorough in their evaluation of impact in other areas. In this instance, thought, the agency's contractor did not have apparently adequate time to complete the evaluation. 1367

For example, Plan 2 of Threatened and Endangered Species, which are -- have been identified as existing in Nebraska by the secondary resources that were employed by the contracting agency, were not included in the DEIS or the 1437

(Statement - Monica Kirk)

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accompanying technical reports. There is not a comprehensive wildlife inventory in the Nebraska area. Had the contractor contacted the State Chapters of the Audubon Society or the Sierra Club or even asked that the Game and Parks Commission which I have done on two occasions. I've been told on both occasions that there is no inventory of Nebraska. Then what that indicates or what that mandates is that the biological assessment be performed under the Threatened and Endangered Species Act. 1437

Another act that was violated was the Migratory Bird Treaty Act for twenty-seven species of water fowl listed in the DEIS. Twenty-five species of raptors, sixteen species of, quote, "special concerns" end quote, fall into the protection of the Migratory Treaty Act. There has been no suggestion in the DEIS that a permit has been sought from the Department of the Interior to the encroachment or what other effect, or that any other mitigated effects have been undertaken. 1406

I take issue with this statement. I don't remember who made it now. There was a reference in the beginning that Maj. Torkerson made that species are not afforded the same protection by the State as they are by the Federal Government, identified as endangered species. That's not the case in Nebraska. Perhaps it's the case in Wyoming, and 1431

(Statement - Monica Kirk)

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perhaps it's the case in Colorado. But our State's Threatened and Endangered Species Act is every bit as strong as the Federal Act. 1431

Then, I guess, the final point is that the primary data source identified in the technical report is not adequately disclosed. The technical reports state that helicopter flights and field surveys were conducted. How many hours were spent in Nebraska? What time of day and during that months of the year were field surveys conducted? 1448

Then as regards the secondary data source for Nebraska, it's my opinion, those grossly and inadequately include no environmental analysis documents or agency files or university research files. Although there is the statement made in the DEIS that those were evaluated, they're not included in the references that are cited. There is no contact made with public interest, conservation groups such as the Sierra Club and the Audubon Society. Nowhere was any contact made with State agencies such as -- apart from the single set of analysis that was conducted by the Department of Environmental Control. The Nebraska Department of Water Resources, the Nebraska Natural Resources Commission, the Nebraska Department of Agriculture and the Federal Soil Conservation all should be consulted. None of those were, and the primary resource that was used to 1415

(Statement - Monica Kirk)

77

compile the wildlife inventory, according to the reference section, was the 1972 Nebraska Wildlife Inventory, which is no longer in print. It's not available for public review and is grossly outdated, and to base an evaluation impact on the secondary -- on those inadequate secondary and primary sources, is just unacceptable, gentlemen. I'm sorry. 1415

Thank you.

COL. SMITH: Do we have to respond?

MAJ. TAGGART: Thank you very much for your comments. You have reviewed the law for the National Environmental Policy Act, but I think you need to review all of the law with regard to the creation of the document so that you will fully understand the scope of what was created.

In this particular action it was pointed out by Maj. Torkerson the direction came from the President on the 19th of April. Congress approved that action on the 25th of May. We initiated the action on the 13th of June by notice of intent to the Federal Register. The study has been ongoing. We use an awful lot of information that was collected prior to the 19th of April since, as you all know, we were out here last winter studying the proposed basing mode. Congress, in September, passed the Authorization Act and established a time frame for the creation of the Environmental Impact Statement mandating that the final

(Statement - Maj. Taggart)

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statement would be published not later than the 31st of January, 1984.

The command of the law is to comply to the full letter extent possible. We have made every effort to scope this document in accordance with the direction we received from the President, Congress and the document does, in fact, include the appropriate alternatives included in a complete discussion of a no-action alternative.

The point made concerning the Scowcroft Commission, the combining of a proposal with the research and development activities, I think you answered your own issue by raising that these programs are research and development programs and there is no intent to develop a proposal within the reasonable, foreseeable future. The command of Congress is to produce a DEIS; to produce it on the deployment of the one hundred Peacekeeper missiles in designated locations, and the Air Force has put a draft together. We appreciate your comments in assisting in getting us to a final Environmental Impact Statement in the time specified by the Congress of the United States.

DR. KRAMER: Your reference to the Section 7 consultation process, this is underway and has been underway relative to the federally listed and State Category One listed species, which we have currently ongoing with the

(Statement - Dr. Kramer)

Department of Interior.

Your comments about where the biologists ought to be trained in Nebraska in order to work. You forget the other major portion of a professional's lifetime; that is, his experience, and where he has worked and, therefore, become knowledgeable. I trust you would believe the fact that we have highly qualified people who have many, many years and decades of experience in this part of the country. They may have originally received schooling somewhere else, but they are thoroughly qualified biologists. I don't want you to take any -- take that much more time here tonight -- but your first comments relative to the document doesn't appear to give a full, complete disclosure. I believe you said the effect of the biological analysis isn't specific enough for us to answer, as far as I can tell, without your giving more examples of what you really mean. Monitoring enforcement programs are already developed as the program and the scenario of construction is developed, and this is, and will be, part of the program. We have done an inventory as appropriate to the project, as you can see from the documents, and don't forget there is a biological environmental plan technical report in support of the DEIS. We have not seen that document. That may answer many of your questions. Please review it. But you will notice that the whole of the

(Statement - Dr. Kramer)

Panhandle of Nebraska is included in our region of influence, and we have, in concert with what we believe is adequate relative to the expected level of impacts of the project, inventories all wildlife plants and animal life from available literature and agencies, and have contacted state agencies in Lincoln, Nebraska, to the extent that we have judged appropriate. I think that answers most of the questions.

LT. COL. WALSH: I would like to answer one other question that you brought up.

With respect to the fact that construction had already begun on the Peacekeeper Project at F. E. Warren. I can assure you that no construction can be -- can begin -- until the final Environmental Impact Statement is filed. Furthermore, Congress has only recently appropriated money in a military construction program for any construction at F. E. Warren Air Force Base. So, therefore, no work could be accomplished prior to that appropriation, and furthermore, no contract exists at the present time.

COL. SMITH: Once again, I remind you that we do have limited time. We request that you limit your comments or statements to five minutes.

The next card I have is that of Mike Hartzler, also from the Panhandle Military Affairs Committee.

(Statement - Lt. Col. Walsh)

281 MR. HARTZLER: My name is Mike Hartzler. I was recently appointed Chairman of the Local Panhandle Military Affairs Committee for the Tri-County area. I've been getting a lot of phone calls and information -- phone calls from the media -- from one side of this country to the other, wanting to know about our problems as far as deployment -- the main problem out here in the Panhandle area due to the deployment is the media giving top billing to local minorities and anti groups, and not recognizing the people who are in support of this program and a strong national defense. If that -- it wasn't included in the impact study, it should have been. Because I can assure you the vast majority of the people in this impact area are not opposed to the deployment of the MX or Peacekeeper. They feel that it is necessary for a strong defense and deterrence to protect our way of life. **103**

I want to thank you gentlemen for being here tonight and thank you for the job you are doing in keeping America free.

COL. SMITH: Thank you, sir.

(Applause.)

COL. SMITH: The next card that I have is that of Irving J. Arnquist.

Good evening, sir.

(Statement - Mike Hartzler)

329 MR. ARNQUIST: Good evening.

My name is Irving Arnquist and I'm a resident of Kimball. We talked a few moments ago about butterflies and birds, and I have three small children who are my life, and my concern is that they do not become extinct. I -- from everything I have been able to ascertain -- feel they are much more likely to become extinct with the Peacekeeper.

I have some questions about the spirit of this country that may have to do with environmental impact. My mama taught me that you don't ever hit someone unless they hit you first. Ever then, if you are big enough, you don't and I question what's happened to our soul when we build the one hundred missiles that are designed to shoot first that are not defensive but offensive missiles. I have real trouble with that, with the Peacekeeper concept. **104**

My concern is that -- I'm not so worried about the Russians perhaps trying to shoot two hundred nuclear missiles into our area to destroy these one hundred missiles, though, that perhaps could come. I'm more concerned about some wierd fanatic, some person like what happened in Lebanon so recently, driving a pickup truck full of explosives. I don't know what that would do -- maybe even to a nuclear bomb -- I don't know why we spend millions of dollars to shoot our missiles into Russia when we could send one over **144**

(Statement - Irving Arnquist)

in a suitcase or truck to haul them in there. It would be so much cheaper. I'm nervous about radicals or derelicts or fanatics doing that here. It seems to me that peace through strength with permanently based missiles in the ground is obsolete because of the -- some of these strange folks running around who, out of weakness, are able to take their great power. I'm wondering what that might entail in the future about protection of these sites so that they are safe, not from incoming missiles from the air, but from events happening strictly on the ground. That's a concern of mine. 144

Thank you.

(Applause.)

COL. SMITH: Thank you, sir.

CAPT. McMULLEN: We appreciate your comments, sir. We are equally concerned about the possibility of a nuclear attack. The Administration is certainly equally concerned, as is Congress. Unfortunately, we can't dis-invent nuclear weapons. They are here with us. We can make every effort to consciously seek limitations on those, pursuing as best we can, reductions on nuclear arsenals in strategic arms reduction talks with the Soviet Union. Over the past twenty years, since we entered into the nuclear age, since we can't disinvent those nuclear weapons we have to

(Statement - Capt. McMullen)

use them to the advantage through state of the art technology to detour and fundamental underlying principles of a deterrence is to prevent any, and would be an aggressor; presumably the Soviet Union, from initiating attack on the United States or its Allies. The policy of the United States, sir, is not a first strike policy. This is not a first strike weapon. It is designed to enhance a combination with the strategic forces and are deterrents.

COL. SMITH: The next card that I have is that of Susan Buckles, attorney for the Executive Committee on no MX.

270 MS. BUCKLES: I'm not an attorney for the Executive Committee. I'm an attorney on the Executive Committee. I have a couple of general comments, a couple of responses to what you have said tonight, or questions of what you have said tonight; then the questions about the DEIS itself.

My general comments are by way of objections. First, I object to the fact that I was sent a 600 page document and only by beginning to review the areas in which I was interested did I find that I had to go to the library to look at 1,200 documents in order to find out what data support of the conclusions in the DEIS used. Needless to say, I was extremely disappointed to find that that data was 33

(Statement - Susan Buckles)

basically lacking. 33

The second objection that I have -- I think I will raise it right now -- is based on something that I heard today. I understand that next Tuesday in Lincoln there will be a private meeting between the Air Force and public officials for the State of Nebraska. I found out from a woman who said we're not supposed to know. This isn't advertised and we're not invited. I object to that 84

The State of Nebraska, in toto, will be affected by this project and there should be public hearings and public comments in the state capitol. Moreover, I am a resident of Scottsbluff County and I heard the Physicians for Social Responsibility analysis which says that living fourteen miles from a proposed MX silo, I am subject to at least third degree burns, if not vaporization if one of those things blows up, and I object that Scottsbluff County was not included in the -- in your zone of analysis, your zone in which you actually analyzed impact. 22 74

I also object to the lack of public hearings in Scottsbluff County, which brings me to my earlier objection 22

I understand that on Wednesday evening of next week you will have a meeting in the County Commissioner's office in Scottsbluff County, which is also not advertised. I have another one. This is a question based on what you 85

(Statement - Susan Buckles)

have said tonight. I find it difficult to believe that an organization which claims it can put warheads outside the earth's atmosphere and turn them around and aim them and hit one hundred targets with precision in three hundred feet cannot take every squadron and every flight in the F. E. Warren Air Force Base and analyze whether there won't be minor or lesser impacts on people, farms and buildings. Different silos are chosen for the MX deployment, I find that totally specious to argue that. You could have done an analysis for farm buildings similar to the one you did for cable routes. I think that is totally inadequate and it should be addressed in the DEIS. 186

I am going to go on now to the comments which I have prepared for this evening.

The DEIS and the Air Force publicity people have repeatedly hinted the coming of the project will be an economic boost for the area. The most blantant example of this was a good old boys meeting which was held in Scotts-bluff in August or September at the Elks Club. I, as a woman, could not attend that meeting. I was not a member of one of the four or five men's organizations which were invited, and I was not a friend of one of those people so I wasn't asked to come and listen. I didn't get to ask the questions there either. The Air Force figures show that the City of 436

(Statement - Susan Buckles)

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Kimball alone will lose 9,419 '82 dollars from the projected carry over funds over the ten-year period of construction. How can you say this will be an economic boost? There is no discussion of actual impact on area businesses. What will be the amount of money actually spent in Kimball County and the City of Kimball, Scottsbluff and Scottsbluff County? What type of materials will be purchased with that money? Who will really benefit economically from the MX? Will small business people face new competition from corporate franchises such as fast food chains who can risk the boom and boost economy and absorb the loss in hopes of high profit? There is also no discussion of the economic impact on individuals, although the Air Force admits that, for example, that increased demand pressures leading to inflationary housing or corporate enterprise could occur during the short term period of construction. How would highly inflated rent and other costs actually affect the growing elderly community of Kimball, most of whom are on fixed incomes? You can note that they will be affected, but you need to discuss what those effects will be and what will be the impact of the boom and bust phenomenon surround the communities, particularly the small counties in this area and who or what the, quote, "public agency" unquote, which will fund the water and sewage treatment systems -- which you say must be

436 417 418 429 436 431 391

(Statement - Susan Buckles)

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built for temporary housing, construction workers in Kimball -- and what will that actually cost?

In regard to social services, the Air Force projects that during the peak construction years in Kimball there will be a maximum of one hundred nineteen new people in town. This number is also used to determine the level of impact, yet the Air Force admits other sections have many unsuccessful job seekers. Those persons should also be taken into account in adjusting the actual impact. How many people will really come to the area? Again, I find it difficult to believe that you cannot at least make estimates of that based upon years of experience in this country of boom and bust economies. Although the Air Force admits many social services are provided on a regional basis from the Scottsbluff-Gering area, it uses only actual job person figures to justify not discussing in detail the actual population induced impact outside of Kimball County. What will the impact be of unsuccessful job seekers on human service providers and consumers in the entire region?

There is serious inconsistency within the DEIS in the actual level of population related impact and what it will be in Kimball, which is the only area discussed. In the social services section it is stated that the health care, law enforcement, human services and criminal justice

391 552 228 552 496

(Statement - Susan Buckles)

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are suffering only negligible impact; however, in the social well-being section it is stated that, quote, "The absence of most human resources in Kimball County is an indication that people must travel for most services or do without certain ones. Those few existing human services also may be more heavily impacted as will other services such as law enforcement and this is provided by volunteer groups."

"The conclusion of the impact and social well-being is a result of human services shortages and are really moderate in significance for the short term." What is the impact? Is it negligible or is it significant? Is it moderate, low, high? What is it and why?

COL. SMITH: Could you try and summarize? We are getting close to the time.

MS. BUCKLES: Only Kimball County -- the Kimball School Districts One and Three are analysed. The Air Force claims that only governmental units are expected to receive five percent or more of the population growth that should be analysed; however, the socioeconomic impact study admits many regional resources will be used, such as a health center, mental health center for domestic task force, the Community Action Agency, West Nebraska General Hospital. There were others regionally which were not even addressed. Legal services. I think there should be discussion on the

496 586

(Statement - Susan Buckles)

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impact of increased regional population on all the governmental units which support these agencies.

Finally, we need to note that under the mitigation section no federal impact aid is suggested for the State of Nebraska. The State of Nebraska will get apparently no federal help. All of it will go to Cheyenne and Laramie County, Wyoming, and one other thing I'd like to ask you in the socioeconomic impact statement there is a list of money budgeted for construction materials. One of the items lists six hundred forty-seven thousand for real estate. How are you going to buy all those farms for that amount of money?

LT. COL. WALSH: In order to allow as many people who have signed up to make statements, to have the opportunity this evening, I just wish to address just a few of the items that you mentioned this evening.

First of all, the document that has been reviewed, both by state officials and with officials in Scottsbluff and with officials in Kimball and with officials in Wyoming and Laramie County, Platte County, et cetera, is the Wyoming-Nebraska Socioeconomic Impact Study, which was required by Memorandum of Agreement signed between the Secretary of Defense, Mr. Weinberger, and the Governors of the States of Nebraska and Wyoming. That particular report was prepared

586 588 180

(Statement - Lt. Col. Walsh)

in conformance with the Wyoming Industrial Siting Act. It did require us to do a completely detailed study, including a full analysis of all social systems in all the counties, including Scottsbluff.

With respect to your statement on the impact on the communities themselves, the purpose of the DEIS is to identify what are the basic impacts to the communities and then to offer a menu of mitigation action. Some of those actions will be taken by the Air Force and some by the local community. It is not the Air Force's prerogative to tell the communities how they should develop and how they should grow; how they should respond to these impacts. That is the option of local governmental entities. Once they have made that decision, that that is the proceeding to have, then the Air Force will work with those communities to insure that they get the necessary support so they can adjust to those impacts.

One other question with respect to the purpose of the DEIS. The decision has already been made by the President and approved by the Congress as to the deployment of the Peacekeeper missile. The purpose of this particular document is to identify what are the impacts of that decision so we can, in fact, build our mitigation plans.

If you wish to talk about some of the other

(Statement - Lt. Col. Walsh)

comments you made, I'd be willing to discuss them with you afterwards.

Thank you.

COL. SMITH: The next card that I have is that of Susan Baack, I believe it is, of Nix, Nebraska.

332 MS. BAACK: I live on a farm close to the missile center and I am really curious as to what's going to happen if, when these missiles are deployed when being installed in segments, how the rural residents and the other people are going to be protected? What kind of safeguards are going to be installed? I didn't find anything that directly pertains to that in the DEIS. I would like those addressed in the DEIS. **155**

COL. SMITH: Thank you.

The next card that I have is Jeff Tracy, a coordinator for No MX.

272 MR. TRACY: I will take only five minutes this time. I am not sure -- on the panel they said that one of the objectives is to identify the basic action so that the level of impact on the populous could be accurately determined. If you look at the DEIS, and some people have pointed out the inconsistency of it already tonight, if it becomes very difficult for anyone to look at the graphs that are provided in the DEIS and be able to determine what the **34**

(Statement - Jeff Tracy)

true impact of the DEIS is going to be on a particular area. **34**
In Kimball County, and I'll go back to transportation again briefly, the overall protected impact on roads on different levels, the aggregate impact comes to a low significant level despite the fact that in Kimball County there will be, at times, throughout the county an increase of traffic up to five hundred percent. On site impact for roads in Kimball **1001**
County is rated as low and adverse, not significant.

Again, I would say that the ratings are totally inaccurate for rural standards. They're based on urban standards. In order to truly judge the significance of the impact on this area in Kimball or in Banner County, there should be a new study done not based on urban traffic patterns.

Secondly, I would like to just briefly mention things that have come up or which have not come up in the DEIS that definitely will have -- need to be answered at some point. Hopefully, in the final DEIS, which we feel should have been addressed in this DEIS. We are the ones who will pay for the mitigation measures adjusted by the Air Force. Oftentimes the Air Force in the DEIS has gone to great length **90**
to determine and show what mitigation procedures are for a particular area, and yet more often than not it is simply listed as a public agency as being responsible for those mitigation measures. The question is who is really going to

(Statement - Jeff Tracy)

pay for that. Is it going to be the residents of Banner and Kimball Counties?

In referring specifically to Nebraska, is it going **90**
to be the State of Nebraska or will it be federal agencies, and why weren't those things designated in here so that residents of Banner and Kimball Counties know specifically what the true economic impact will be on this area.

Secondly, what restrictions on personal privacy will be imposed upon local people once the missiles are in place? We know from the energy section that there will be a 230 percent increase in road usage simply for the replace- **143**
ment and maintenance of the MX missile system, above what is now projected or which is now being used for the Minuteman. What's the impact on residents -- what is the impact going to be on local people? Perhaps it is not of any significance, but why was it not addressed?

Thirdly, why does the Air Force refuse to answer the public's questions regarding what if something goes wrong? We already have had several instances of that tonight. **155**
In the scoping hearings many issues were raised that were of concern to the public that were flatly refused to be addressed in this DEIS.

Fourthly, why does the Air Force refuse to comply with the law set up for the protection of people and **190**

(Statement - Jeff Tracy)

and their environment? In here I'm referring specifically to the exemption granted by the Air Force to themselves for safety zones that they deem necessary for the safety of the public. Whether that be around -- or whether that be for homes or homes within the quantity district or whether that be for roads, we feel that for an agency to say that a safety zone is necessary for the public's own safety is fine. But to turn around and exempt yourself from that safety zone, I don't understand how that can be to the best interest of the public. I realize that 97 percent of all the MX silos are within the restricted zone of public service roads, and that to move all of those would be an incredible amount of new land taken; however, if that is a true safety zone, then why can you exempt yourself from those standards?

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Thank you.

(Applause.)

LT. COL. WALSH: Just a few quick answers to the points that you brought up.

As I indicated this afternoon, we appreciate your comments on the rural roads and we will take that into account when we do the FEIS, prepare it.

With respect to your issue or question regarding issues brought up in the scoping process, we are legally required to respond to every item that was brought up, and

(Statement - Lt. Col. Walsh)

you will find in the appendix of the FEIS with a notation that they have been included in the study or there was a reason given why it was not included in the study.

Likewise, for the FEIS we're legally required to respond to all issues brought up in the public comment period, whether verbally or written, and either show where it is incorporated into the document or the reasons why it was not incorporated.

Another question I fully appreciate your comment with respect to how to put in all resources together so that you can have a proper perspective on the impact on your particular community of interest. I, therefore, refer you to what we call the Jurisdictional Environmental Planning Technical Report, which does just that. It gives you an assessment of impact on the various jurisdictional entities such as Kimball, Scottsbluff, Cheyenne County and urban area, et cetera.

With respect to the mitigation action, the same concern of who pays. The item that was put in the mitigation action is the agency for the governmental entity that would be responsible for initiating the action. As I indicated before, it is a menu of possible mitigation actions, but it is local government energies that are the ones that make the final decision on which ones they wish to implement. We

(Statement - Lt. Col. Walsh)

identified those governmental entities. They are the people that initiate the action, not necessarily pay for it, and as I indicated earlier it will be the federal government working closely with the governmental entities that will divide the appropriate amount of federal support to insure that the local people do not bear the full burden of the impact brought about by this particular project.

I think I have answered most of your questions that you brought up.

Thank you.

COL. SMITH: The next card that I have is that of Dennis Baack, and it's Dix, Nebraska, not Nix. I was in error apparently before.

Good evening, sir.

331 MR. BAACK: Good evening.

First of all, I'd like to address a comment to what Mr. Hartzler had to say about the residents in and around the community the last few months about people that disagree with the MX as being anti-American.

Well, I disagree with the MX, and I'm an American, and one of my rights is freedom of speech. I want that right protected, and I don't know, I guess I missed the ballot when we took this poll of all the people in the area that this will impact to say that the majority of the people

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(Statement - Dennis Baack)

in the impact area are in favor. I guess I missed that poll when they took that.

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I guess my main concern with the MX is who's going to monitor the Air Force when they put it in? I can add to some comments of Mrs. Lenzen about the accidents south of town in which I was involved, in which I was driving down the road. I guess the Air Force was involved in some mock invasion of the missile center or something. I was driving down the road at night with no warning and all of a sudden I come up and there are men all around the side of the road. Men running across the front of me, no warning. I don't see that as organization, as that's a concern for safety, and I think that's a primary concern that the Air Force needs to have, it's for safety. These actions that they did show me that the Air Force feels they're big enough and that they don't have to listen to local law. So what kind of monitoring system are we going to have to keep the Air Force in line so that they do not have a major impact on environment?

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Thank you.

(Applause.)

LT. COL. WALSH: We will be working closely with the State of Nebraska and with the State of Wyoming in developing a mitigation agreement. The mitigation plan

(Statement - Lt. Col. Walsh)

that is to be prepared by those two state governments is supposed to be ready by thirty days after the filing of the FEIS.

In that particular document one of the plans would be to put in a monitoring system in order to check the validity of the predictions, both the socioeconomic study and the DEIS, so that if there are any deviations from that projection which cause further burden on the local governmental entities we can identify them when they occur and take appropriation action.

Thank you.

CAPT. McMULLEN: One additional comment. We really appreciate your informing us regarding this activity that occurred, and the other day I was speaking to Col. Henry who is the current 90th Strategic Missile Wyoming Commander, who is responsible for the two missiles out here and all personnel attached to -- assigned to them -- and he has asked one of his representatives to come out to these hearings. There is an individual here in the audience this evening taking notes of these types of responses. But the point that Col. Henry meant to make to me was to insure, as you talk to people, to tell them that we need to know about these things. If there is some security that are turning off their lights, please let them know where it takes

(Statement - Capt. McMullen)

place. That is necessary so that we can do something. We don't want to cause a safety hazard or problem out here in the community. So to answer your question, you have one of the best monitors. We appreciate that comment. I know that Col. Cutter has made a note of that.

Thanks again.

COL. SMITH: The next card that I have is Kevin Ruser, I believe it is, from Scottsbluff, Nebraska.

Good evening, sir.

392 MR. RUSER: Good evening.

I guess in deference to the other people, I won't take too long. I ask that my comments be addressed in the final Environmental Impact Statement rather than orally here tonight.

CAPT. McMULLEN: We are having a difficult time hearing you.

MR. RUSER: I'm sorry. I'm not used to speaking into a microphone.

I had a few general comments. The presentation tonight distrubed me a little bit in that you took some time to go through what you saw as being a summary of the DEIS, and now we are running out of time to respond. I would have thought, or my impression of these hearings was, that we would have an opportunity to respond to your comments. **16**

(Statement - Kevin Ruser)

which was a 600-plus page document. So I'm a little disturbed at that. Another thing that disturbs me a little bit is that the summary of the project impact is in the Environmental Impact Statement process pamphlet that we were handed when we walked in. I think it's a little misleading and I suggest this as something that the final Environmental Impact Statement might take into consideration **16** **34**

The adverse impacts are noted as circles either clear ones or dark ones. The beneficial impacts, which can be small or large, also fill the entire squares. I think that's a little misleading to people also. There could have been, I think, a better way to portray that. I had some comments about land use. The thing that I found lacking in the land use section of the DEIS, and was what the impact will be after cables are installed or after the adjustments are made on the site with respect to maintenance, and with respect to the security measures. Most of the complaints that I have heard from the people who live in the area have to deal with not what happened when the Minuteman went in, but the inhabitants. In terms of maintenance and security, I suggest to you that -- I come from a farm background and I think that land use impact could not be considered to be insignificant if it involves destruction, especially during a crucial time of the year. Use of certain roads, use of **1136**

(Statement - Kevin Ruser)

fields to get in and so I think that the final Environmental Impact Statement ought to address what the likelihood is and the frequency would be of things that need to be done in terms of security and maintenance to the cable lines and also to the silos themselves and that would lap over into transportation also, I think. **1136**

I also think that again the DEIS is defective in that the scope is not sufficiently broad. I would suggest that it should include all possible things that might be done such as super-hardening of silos, possible AIBM system, that sort of thing. I would prefer that, since the purpose of the Environmental Impact process is to inform people of what this impact would be, that if it is not going to be ruled out, it should be addressed. Another thing that I had a question on was one of the elements of the significance analysis, as I understand it, was to consider what public opposition would be, and that was supposed to be one of the elements taken in determining if the impact would be significant or insignificant. If that was done, I did not see that done, and I -- if it was -- if there was determined to be no public opposition and, therefore, no significant impact, I think probably that should have been stated, and which that might be addressed in the final Environmental Impact Statement. **35** **63**

(Statement - Kevin Ruser)

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A couple of things that other speakers brought up tonight here also raised some question in my mind. It's being suggested that there were studies done on recreational impact on the entire area, which includes a bigger expansion than just Banner County and Kimball County. If, in fact, all of Oliver Reservoir and south of town here is financed by National Resource District, were there also economic studies done on the base that supports the tax base that supports the resources which apparently is a natural resource district composed of Cheyenne, Dewell and Kimball Counties? I think that probably the economic impact assessment ought to be done on Dewell and Cheyenne Counties in that regard, and again, going back to the security thing.

420

What will the degree of security be required, depending on the different scenarios that might happen, and how will that affect our use of land and roads and that sort of thing?

1136

Finally, I'd like to address one thing with respect to the suggestion that was made that we are not able to disinvent nuclear weapons. In 1945, Robert Oppenheimer witnesses the first explosion of a nuclear weapon at Los Alamos, and what came into his mind was a bit of inscripture which was, "I am MacBeth, the destroyer of the world." He was awed by the power of that weapon. Eighteen years later,

(Statement - Kevin Ruser)

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Martin Luthur King stood in front of a quarter of a million of people in Washington, D. C., and described the power of the bomb and said that his dream was that the scripture should be fulfilled: that nations should -- neither should go to war. War in that context, I suggest, is possible to achieve Mr. King's dream rather than Oppenheimer's vision. But only if we start giving up the gun, both of us, all sides, all people. In that context I recommend a book to you by Noel Parent "Giving Up the Gun," which Japan did in medieval times.

Again, because of the shortness of time, I would just ask that my comments be addressed in the final statement.

Thank you.

(Applause.)

COL. SMITH: Thank you very much.

The next card that I have is that of Joan Snyder of Kimball, Nebraska.

Good evening, Ma'am.

400 MS. SNYDER: Good evening.

I'm a third-generation western Nebraskan. I have family here and I hope to stick around this area for awhile. We have concerns about the MX missile. I would like to say that I can feel with Mr. Beack because our honorable leading citizens in town do speak out for the MX, and they're very

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(Statement - Joan Snyder)

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influential. I feel that many people have been a little shy about expressing our opinions. So maybe this is the reason that you haven't heard that some of us aren't all in favor of the MX.

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I guess one of the things that surprised me about this volume of books, after being to the first hearing, I thought we would come back and have some answers in the books. Because when I stub my toe, I say "ouch." But I think probably half the people in this room could take a page and when they get to the bottom, still wouldn't know whether it was broken or just going to turn black and blue and still just be "ouch," and I thought we're very concerned with the rural fire volunteer department. My husband is on the board, and one of the direct questions that was asked was: How much and to what degree would the fire protection in or near the MX missile sites, would the local volunteer department be responsible for that and the local firemen?

That night also we asked specific questions as to what type of fires would they be, would they encounter. If there was one, would they be expected to fight it; would they need special protective clothing, you know. I really thought some of these answers would be in these books, and I didn't find them. Do you suppose you could come out with some more specifics on that?

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(Statement - Joan Snyder)

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The other question I had was about transportation. I think Mr. Tracy has covered that.

Thank you.

COL. SMITH: Thank you.

The next card I have is that of John Ferguson, also of Kimball, Nebraska.

347 MR. FERGUSON: I think there is some mistake. There are two John Fergusons, but the other one isn't here. I do not remember signing a card, but I'm very happy to have the opportunity. I didn't think I was going to get it.

The only thing that I'm concerned with is: am I going to be able to remain an American, and are my children going to be able to have a life of freedom. Apparently the MX, according to some of the things that I've heard here, is feared by the Russians. I think that's wonderful. I think it is worth us putting up with a great deal of inconvenience and hardship in order to have a very strong deterrent to Russian aggression.

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I feel that the MX is probably not the final answer, but it is a step in the right direction. To me, everything else -- every other consideration -- is nit-picking. I think I can live a long time if the Butterfly Bush disappears. I like the fish, but I think I could do away with the Bronze Back Cutthroat Trout. I think I can

(Statement - John Ferguson)

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even put up with maneuvers at night in the country because I know that they are necessary to keep our security forces on the alert.

I note that our ministers friends saw fit to criticize our Mayor for misusing a word or two. I'll probably misuse a word or two myself, but I would suggest to that gentleman that he take a trip to Cambodia or Afganistan and see how the rights of people that he is so concerned of are treated in those countries. I agree with our doctor friend that nuclear wars are horrible. It can't be anything else. But I would sooner be vaporized, I think, than to have to live under the conditions that those people have in their native land through Communist aggression.

Thank you.

(Applause.)

COL. SMITH: Thank you, sir.

The final card that I have is that of Marla Painter, representing the Western Solidarity.

302 MS. PAINTER: I promise I will be brief.

I represent the Western Solidarity, an eight-state western alliance of individuals who are patriotic; who love their country; who don't want to be Communists. They also think that the MX system is very dangerous, and leads us closer to nuclear war, not further from it.

(Statement - Marla Painter)

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I have one serious concern which nobody else has addressed specifically. Over and over again the Air Force has said that they do not need to comply with National Environmental Policy Act. One of the things that these weapons are supposed to be doing for us is protecting us and protecting our way of life, and much of our way of life is dependent upon our laws. The National Environmental Policy Act, whether you like the Act or not, is the law. It clearly states the EIS is not to be used to justify a decision which has already been made, but to provide criteria with which to make a decision about the proposed action.

Although the Air Force explains they are following the Presidential order, I must respectfully maintain that the President is not above these laws, any more than members of Congress. In consultation with attorneys, we also maintain that the so-called Jackson Amendment, the exemption alternative, as an alternate basing mode and not the specific basing mode -- the proposal lists a full EIS following all of the laws, all of the regulations therein. I think that each time we propose that to you -- you don't need to follow the law -- you are incriminating yourself.

I'd be happy to quote that part of the CEQ regulations for anyone who would like to see it. Also, I think

(Statement - Marla Painter)

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it's important for people to understand this isn't just a local problem. It's a national problem, and if an anti-ballistic missile system comes in or a super-hardening comes in, it's going to be a far-reaching regional problem in the west. People need to understand that if you put a very valuable missile in a very vulnerable position, you have two options: Either you are going to use it or you might someday lose it if there is Soviet first strike, because we no longer supposedly target first civilian populations, but rather military targets, they are faced with either -- if they were afraid we might use our weapons -- using theirs or facing annihilation. I don't think anybody wants to see any of that happen.

So, I'd like everyone to reconsider just how safe this proposal is. It doesn't have anything to do with how much we love our country.

Thank you.

(Applause.)

COL. SMITH: Thank you, Ma'am.

That's the end of the cards that I have, and we have reached the scheduled time for closing the meeting.

I remind everybody that written statements may be dropped into the box on the registration table in the lobby or mailed to the address that is on the handout that was

(Statement - Marla Painter)

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available at the entrance coming in tonight. Statements should be postmarked no later than the 28th of November, 1983.

Does the panel have any additional comments?

(No response.)

COL. SMITH: Ladies and gentlemen, we thank you very much for your participation here and this meeting is now adjourned.

(Whereupon, the hearing concluded at 11:10 p.m.)

C E R T I F I C A T E

I, KELLI HATANELAS, a Certified Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 110 pages constitute a full, true and correct transcript.

Dated this 22nd day of November, 1983.

Kelli Hatanelas

KELLI HATANELAS

6.3 Documents Received After the Public Review and Comment Period

All comments postmarked by November 28, 1983 were analyzed and responded to and are included in this Public Comment Volume. A limited number of comments postmarked after November 28, 1983 were also received. These late comments were reviewed and considered as were all other comments received. Where practicable and appropriate, last-minute changes have been incorporated in the FEIS. The late comments, however, did not identify any major problem areas and did not receive individual responses. To provide a complete record of all comments received, these documents are included in Section 6.3.2.

6.3.1 List of Respondents for Documents Received Late

The following is a list of respondents who submitted comments after the 45-day review period ended on November 28, 1983. These are listed by type of affiliation in alphabetical order.

FEDERAL

DOCUMENT: A
Advisory Council on Historic Preservation
Louis S. Wall
Chief - Western Division of Project Review
Golden CO

DOCUMENT: B
U.S. Department of Agriculture
Soil Conservation Service
George W. Hartman
State Soil Scientist
Casper WY

DOCUMENT: C
U.S. Department of Agriculture
Soil Conservation Service
Sherman L. Lewis
State Conservationist
Lincoln NE

DOCUMENT: D
U.S. Department of Energy
Kansas City Support Office
Ronald J. Brown
Director
Kansas City MO

FEDERAL

DOCUMENT: E
U.S. Department of Transportation
Federal Highway Administration, Region VIII
Frederick L. Cooney, P.E.
Wyoming Division Administrator
Cheyenne WY

DOCUMENT: F
U.S. Department of Transportation
Federal Highway Administration
R.H. Hogrefe
Division Administrator, Region VII
Lincoln NE

STATE

DOCUMENT: G
Nebraska Energy Office
Kandra Hahn
Lincoln NE

CITY AND MUNICIPAL

DOCUMENT: H
City of Cheyenne Mayor's Impact Team
Heritage, Values, and Well-Being Subcommittee
Barbara Rogers
Chairperson
Cheyenne WY

DOCUMENT: I
City of Greeley
Rebecca L. Safarik
Community Development Director
Greeley CO

ORGANIZATIONS

DOCUMENT: J
Poudre Nuclear Freeze Campaign
David R. Meyer
Susan M. Hierta
Ken C. Bonetti
Fort Collins CO

ORGANIZATIONS

DOCUMENT: K
United Way of Laramie County
Vernie Martin
President
Cheyenne WY

DOCUMENT: L
Wyoming Nuclear Weapons Freeze Coalition
Sarah Gorin Jones
Laramie WY

INDIVIDUALS

DOCUMENT: M
Jane E. Buikstra
Professor of Anthropology
Northwestern University
Evanston IL

DOCUMENT: N
John D. Erdmann
Cheyenne WY

DOCUMENT: O
Sandee Krueger
Simi Valley CA

DOCUMENT: P
Barb Miller
Laramie WY

DOCUMENT: Q
Dr. Lawrence M. Ostresh, Jr.
Professor of Geography
University of Wyoming
Laramie WY

6.3.2 Documents Received Late

This section includes all documents postmarked after the public review and comment period ended on November 28, 1983. The documents are presented four sheets to a page and lettered A through Q.

Advisory Council On Historic Preservation

A

1522 K Street, NW
Washington, DC 20005

Reply to:

730 Simms Street, Room 450
Golden, Colorado 80401

December 1, 1983

Mr. James F. Boatright
Deputy Assistant Secretary
of the Air Force
Department of the Air Force
Washington 20330

Dear Mr. Boatright:

On October 19, 1983, the Council received the draft environmental statement (DES) for "Peacekeeper in Minuteman Silos", an action of the Air Force which, according to the document, will affect the Francis E. Warren Air Force Base National Historic Landmark and numerous other historic properties (chitectural, archeological and historic sites) which are included in or are eligible for inclusion in the National Register of Historic Places.

As you are no doubt aware, the Air Force for a number of years has been working with the Council to ensure property protection for the historic properties that would be affected by the deployment of this defensive system. Earlier this year we were working with the Air Force and its consultants toward an agreement on the procedure that would be followed with regard to the deep pack deployment mode. However, when that mode was rejected in favor of the reuse of existing silos all discussion between us and the Air Force on this undertaking ceased. Although the document before us clearly indicates the need to comply with Section 106 and Section 110(f) of the National Historic Preservation Act, as amended, and indicates that consultation with regard to the management of Francis E. Warren Air Force Base is on-going with the Council and Wyoming State Historic Preservation Officer, it does not explain what steps will be taken to comply with these preservation mandates for the rest of the undertaking. We still believe that compliance should be achieved programmatically in advance of field work and start of construction rather than piecemeal as individual historic properties are identified and threatened.

Therefore, your assistance in assuring that all historic properties affected by the proposed Peacekeeper Program are adequately considered is solicited. We are especially concerned about the potential of this program to adversely impact the Francis E. Warren Air Force Base National Historic Landmark. Please arrange for the Air Force to reopen the discussion with the Council and Wyoming SHPO on this matter at the earliest possible time in order to finalize a program that assures adequate protection of historic and affected historic properties and satisfies the legislative preservation mandates. To do this please have the appropriate Air Force personnel contact Brit Storey of my staff.

Your assistance in getting this matter on the right course will be greatly appreciated.

Sincerely,

Louis S. Wall
Chief, Western Division
of Project Review

6m

United States Department of Agriculture

Soil Conservation Service

100 East B Street - Room 3124
Casper, WY 82602
December 21, 1983

B

AFRCE - BMS/DEV
Norton AF Base, CA 94209

Attn: Major Torgerson

Gentlemen:

The Soil Conservation Service Wyoming State Office has no comments on the Environmental Impact Statement for the Peacekeeper missles in southeastern Wyoming.

Sincerely,

George W. Morton
State Soil Scientist

The Soil Conservation Service is an agency of the Department of Agriculture

United States Department of Agriculture

Soil Conservation Service

Federal Building, Room 345
100 Centennial Mall North
Lincoln, NE 68508-3866

C

December 29, 1983

Major Donald A. Torgerson
AFRCE-BMS/DEV
Norton AFB, CA 92409

Dear Major Torgerson:

We have reviewed your draft environmental impact statement on Peacekeeper Minuteman Silos in Nebraska. We found the report well written and complete; therefore, we have no additional comments to add.

Please provide us a copy of the final environmental statement.

Sincerely,

[redacted] L. LEWIS
State Conservationist

cc:
Peter C. Myers, Chief, SCS, Washington, DC

The Soil Conservation Service is an agency of the Department of Agriculture

D

Department of Energy
Kansas City Support Office
324 East 11th Street
Kansas City, Missouri 64106

December 22, 1983

Major Torgerson
CLN Air Force-BMS/Dev.
Norton Air Force Base, CA 92409

Subject: CLN Peacekeeper in Minuteman Silos Draft Environmental Impact Statement

Dear Major Torgerson:

In response to your teletype message of December 21, 1983, regarding the above subject, the U. S. Department of Energy, Kansas City Support Office submits a negative response.

Sincerely,

Ronald J. Brown, Director
Kansas City Support Office

E

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

Wyoming Division Office
P. O. Box 1127
Cheyenne, Wyoming 82001

December 21, 1983

Peacekeeper - Draft EIS

File No: 402

Major Peter Walsh
Director, Environmental Planning Division (DEV)
Dept. of Air Force, AFRCE-BMS
Norton Air Force Base, CA 92409

Dear Major Walsh:

Since we have been directly involved in the evaluation of roads for the Peacekeeper Missile, we had not planned to send a formal comment on your draft EIS. However, in response to Major Torgerson's telephone request of December 20, we make the following comments:

1. We have no additional comment to make on the Wyoming Highway Department's comment on State roads except to reinforce their view that agreements will have to be made very early with the Highway Department to start design work or any work needed on State highways.

2. Our views on upgrading the County roads are contained in the attached report which represents our independent evaluation of the access road needs for the Peacekeeper Missile System.

3. We do want to emphasize that once the type of construction is specified (gravel vs paved), during the design phase every attempt should be made to conserve our material resources in order that these materials are not depleted and remain available for future work on the State and County road systems. Stage construction practices should also be utilized if at all possible as we now do on other highway

Page 2
Peacekeeper - Draft EIS

design and construction. We intend to use our best engineering judgement and practices once approval is given to commence design. By doing this, we can reduce the impact. Also, by spreading the construction out over several years on a priority basis, it will lessen the impact on the construction industry and should reduce overall costs.

Sincerely yours,

FREDERICK L. COONEY, P.E.
Division Administrator

Enclosure

cc:
Major Torgerson, w/enclosure
Region HPR-06, w/enclosure

Memorandum

US Department of Transportation
Federal Highway Administration

Subject: Peacekeeper ICBM Deployment - Wyoming and Nebraska - Road System Evaluation

Date: December 7, 1983

From: F. L. Cooney, Division Administrator, Cheyenne, Wyoming
Roy Huppfa, Division Administrator, Lincoln, Nebraska

Reply to Attn of: HPD-WY, HPA-NE

To: Mr. Thomas Edick, F-13, Direct Federal Program Administrator, Office of Direct Federal Programs

This is in response to the August 17, 1983 request for an independent evaluation of the access road needs of the Peacekeeper Missile System.

FHWA's evaluation of the access road needs has involved three phases. First, coordination activities were necessary to better define Air Force needs. The second phase was the coordinated preparation of a needs report by Nebraska and Wyoming. Finally, phase three was FHWA's review and evaluation of the States reports of which this response represents the interim completion. All three phases were completed within the short time frame of three months and required a considerable time commitment including several coordination meetings with States, County, Air Force, and MSMC personnel.

Each state has prepared a report on our request which includes construction improvement options providing different levels of service. These two reports are included with this submission. Proposed improvements and the resultant costs are based on a broad level of analysis. It is understood that detailed engineering design will produce project level variations to the general assumptions and proposals made in these reports.

Early coordination meetings identified difficulties in determining the level of traffic service considered necessary by military users of the access roads. Following discussions on this point, as well as others, certain "common parameters" were agreed to and communicated to all parties. Although these parameters are included in each States report, below is a summary:

1. States proposals should reflect a better road system than the existing T-S system.

2. Minimum AASHTO standards would be used in developing roadway section recommendations. This is further substantiated by the fact that both Wyoming and Nebraska policy requires these minimum standards when improvements are to be undertaken.

3. Cost estimates involving pipe culverts were based on inventory data supplied by URS Borger. A standard improvement cost was used for all culverts 36 inches or less with 2 ft or less of cover.

4. Cost estimates involving structures (over 20 ft in length) were based on state inventories. For consistency, each state estimate assumes impact loading.

5. The design vehicle was the Type II Stage Transporter with loadings as shown in the attached drawing (Attachment 1).

Wyoming

The State's report is based on the existing T-E road system but analyzes an additional 32 miles of possible alternate routes for consideration by the road users. In addition, an appraisal was made of routes which would not be traveled on by the T-E vehicle but would serve an important role in the security surveillance and the construction of the missile sites.

Wyoming's analysis indicates that the existing T-E routes are, to a large extent, on the State highway system and already largely paved. The report summarizes that, of the total 667 miles of T-E routes, approximately 320 miles are on the State system and 425 miles are now paved. Approximately 287 miles are on the County system of which 105 miles are now paved.

The Wyoming report presents three basic improvement alternates with additional life cycle-surface cost comparisons provided in separate appendices.

Nebraska

In their report, the State determined necessary system changes and then identified needs on assumed approval of the changes. The changes result in a net addition of 16.7 miles of county roads to the Nebraska system.

Nebraska has a much less extensive State highway system than Wyoming. Because of this, the Nebraska report basically recommends paving additional county roads rather than strengthening existing State paved roads as in Wyoming. Alternate 6, for example, indicates paving of 84.6 miles of existing gravel county roads. Presently, some of the county roads on the T-E system are paved.

The Nebraska report presents nine construction options with life cycle and other cost information associated with each. Option nine was added at the request of the Air Force to show gravel-only improvement costs on the existing T-E system.

FHWA Evaluation

Attachment 2 provides a summary of two alternates from both Wyoming and Nebraska. Costs are split to indicate those expected to be the responsibility of the Air Force (capital improvement and periodic regraveling) and those expected to be the responsibility of others (routine maintenance). Immediate road needs to handle the planned launch facility modifications are estimated to cost $72 - $77 million in Wyoming and $20 - $26 million in Nebraska.

In Nebraska, Alternate 6, paving 84.6 miles of county roads, results in a reasonably consistent ratio of paved to gravel roads compared to Wyoming. Even though 16 of the Nebraska missile sites would still be served by a gravel surface substantially the same as today, the total travel on gravel roads would be significantly reduced even for access to those sites. After 20 years, the paved roads will require costly rehabilitation by the counties, which have limited resources.

For an additional cost of $5.6 million, the entire access road system in Nebraska can be paved. The 20-year life cycle costs indicate that the Air Force costs would be approximately the same for either Alternate 2 or Alternate 6. On this basis, the Nebraska Department of Roads recommends Alternate 2. To the Nebraska Division Office, either Alternate 2 or Alternate 6 would suffice.

Alternate 6 is entirely acceptable to Kimball and Banner Counties in Nebraska. Anything less would be opposed through their Congressional Delegation. They will accept the additional paved road maintenance responsibility and have passed resolutions to that effect.

In Wyoming, Alternate 1, which basically results in no additional paved roads, is the preferred choice of the Wyoming Highway Department. This alternate is acceptable to Goshen and Platte Counties, but not to Laramie County, which prefers that all T-E routes be paved. In an analysis of those routes serving three or more missile sites, all routes fitting this criteria are already paved (with the small exception of Link 185 in Laramie County). Although this "trunk of the tree" analysis was not a specific criteria in developing the alternates, it is an indicator of system functional classification.

For an additional cost of $5.3 million, the remainder of 182 miles of county roads in Wyoming could be paved. Considering regraveling three times over a 20 year period, projected Air Force costs would be higher for Alternate 1 by $6.4 million. With maintenance costs projected, the two alternates are very close. However, of primary importance is the additional heavy maintenance responsibilities placed on the counties under Alternate 1. The Wyoming Division Office concurs in the Wyoming Highway Department's preference for Alternate 1.

An additional analysis was performed in Wyoming following submittal of the State report and receipt of priority missile site deployment from the AFPCE-BMS/DEVP on December 2, 1983. This information is shown in Attachment 3. Based on this anticipated deployment schedule, costs by link were summarized for the "First 10 Sites" and "Second 10 Sites". These costs total $14.4 million and $7.7 million respectively for Alternate 1. Because links were not grouped to produce the most cost effective project development, these costs should only be considered preliminary. For example, in considering improvements for deployment of Site P-7, it may be advantageous to make improvements leading to Site P-10 in the same contract.

In summary, we consider Alternate 1 in Wyoming and Alternate 6 in Nebraska to represent the best improvement alternates considering all factors. In addition to minimum cost, other factors which were strongly considered included compatibility with adjacent State's roadway surfacing, Peacekeeper deployment related traffic, county maintenance commitment, and road accessability.

A further explanation is in order regarding development of the typical roadway sections in Wyoming and Nebraska. As the two State reports indicate, differences do occur in roadway section design which was assumed for preliminary estimate purposes. We do not see this as a problem, however. Because of the limitations of time and data placed on development of estimates, some differences were expected. We propose that, at the preliminary design phase, uniformity of roadway sections will be developed. For purposes of the estimates made here, total consistency in roadway sections was not necessary as there are variables which will occur in roadway design.

Additionally, we are suggesting that, at the point of preliminary design, careful consideration be given to identifying and utilizing existing gravel in place. Although not presented in either State report, we also suggest that options be considered for stabilization of the existing gravel (and/or subgrade) by means of roadmixing with a stabilizing agent such as cement or fly ash. This method could possibly save funds and reduce future maintenance as well as prevent rutting which could result on asphalt surfaces. Stabilizing could reduce grading and other miscellaneous costs as well as minimize the depth of asphalt concrete overlay. This procedure would help conserve good aggregate materials that will be needed in the future for higher type facilities.

In order to accomplish the deployment schedule established by the Air Force, it is imperative that the Wyoming Highway Department be authorized to proceed with preliminary engineering at the earliest possible date. Even if the authorization could be limited to data collection until type of work was identified, this would expedite the necessary steps prior to construction. Because of the extent of work required, it is essential that preliminary efforts be undertaken as soon as possible particularly on structures.

We submit this response with the understanding that it represents an interim report. A more complete and detailed needs estimate will be submitted within a few weeks. We trust the information contained in this response is more than adequate for your needs. We are available at any time to respond to your questions or comments.

FREDERICK L. COONEY

R. H. HOGNEFF

Attachments (5)

F

U.S. Department of Transportation
Federal Highway Administration

December 20, 1983

In Reply Refer To:
HDA-NE

Ronald A. Torgerson, Maj, USAF
AFRCE-BMS/DEY
Norton AFB, CA 92409

Dear Major Torgerson:

This is to inform you that we have no comments on the Peacekeeper environmental impact statement.

Sincerely yours,

E. E. Rogers
Division Administrator

G

STATE OF NEBRASKA

ROBERT KERREY • GOVERNOR • KANDRA HAHN • DIRECTOR

RECEIVED
DEC 1 1983
POLICY RESEARCH

TO: Gayle Malmquist

FROM: Kandra Hahn

SUBJECT: Comments on Wyoming and Nebraska Socioeconomic Impact Study

DATE: November 30, 1983

The Wyoming and Nebraska Socioeconomic Impact Study does not address energy issues at all. The Nebraska Energy Office feels that in many cases the energy-related socioeconomic impacts of the Peacekeeper project will be insignificant. There is one notable exception which is the migration impacts on two small municipally-owned electric utilities in Kimball & Gering.

We see the potential for a negative impact in the area of electricity rates related to the influx of 40 to 60 families. Even though incremental kilowatt hour (kwh) sales due to this migration are probably going to be less than 450,000 kwh per year per community, there may be a rate effect because of "demand" charges to the community. All wholesale customers of electricity in Nebraska have clauses in their contracts with their suppliers which base part of the annual cost of electricity on a percentage of the largest hourly consumption. This is the "ratchet" charge which is related to community demand for electricity. The influx of 40-60 families could significantly increase the peak consumption of electricity in each of these small towns. All ratepayers would then be required to pay for this increase in consumption during the next twelve-month period through a higher ratchet charge.

Thus, the potential exists for short term rate increases over and above the baseline projections for operations without the Peacekeeper project. The long term demand impacts would probably not be significant.

NEBRASKA ENERGY OFFICE, BOX 95085, LINCOLN, NEBRASKA 68509-5085 PHONE (402) 471-2867
AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER M/F/H

Gayle Malmquist
Page Two
November 30, 1983

Our second concern lies in the area of capital equipment purchases. If these communities expand their transmission systems to serve forty to sixty new families, those families can be expected to assist in paying for the expansion for the time that they are in the community. But should they leave before the expansion is paid off, the rest of the community will be left to pick up the tab. This would also act to drive up rates.

As a result, I urge the Air Force and its contractor to investigate and include these items in their study.

GAL:me:2426

H

CITY OF Cheyenne, Wyoming 82001

CITY COUNCIL
ROBERT STOCK, PRESIDENT
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CAROL E. [illegible]
JOAN CLUTE
JANE CRAWFORD
W. P. MARK GRIFFITH
WANDA MCCUE
GEORGE SCOTT
RONALD N. ROGERS

November 9, 1983

James R. Boatright
AFRCE-BMS/DEY
Norton AFB, California 92409

Dear Mr. Boatright:

Attached are the comments from the Heritage, Values and Well-Being Subcommittee of the Mayor's IMPACT Team (Cheyenne) with respect to the DEIS for Peacekeeper in Minuteman Silos. The first set of comments are general in nature and were submitted to you at the Cheyenne public hearing on November 2nd (3 P.M.). The second package comments in more detail on specific sections of the DEIS (Social Well-Being, Human Services, Land Use & Housing).

We have been asked to clarify the first paragraph in the November 2nd statement. It is our position that the DEIS, taken as a whole, does not provide a usable overview of how the project will affect the community. While many sections of the document, including Social Well-Being, give an overview in a limited issue area, there is a need for a more complete packaging of information. The Heritage, Values & Well-Being Subcommittee is particularly concerned about local quality of life. All issue areas affect quality of life, but there is not a good composite picture of how our quality of life will be affected.

In addition to the enclosed comments, the Subcommittee will also be submitting to you and to the Mayor a position paper with regard to human services, particularly emergency services (shelter, food, transportation, etc.), as they relate to anticipated Peacekeeper impacts. It is our intent to have the paper completed within the next week.

We look forward to seeing our concerns reflected in the final EIS.

Sincerely,

Barbara J. Rogers

Barbara Rogers, Chair
Heritage, Values & Well-Being Subcommittee

BR:lm

HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
MAYOR'S IMPACT TEAM

Comments: Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos

November 2, 1983

The Air Force's Draft Environmental Impact Statement does not pull together a coherent sense of how the community will be affected by MX development. If the community is to cope effectively with impact, it must understand the scope of the project. Once the extent of impact is clear, local citizens can organize to set priorities for directing growth and preserving the community's quality of life. Developing this understanding and knowledge among local residents is the responsibility of both the community and the Air Force. The Draft Environmental Impact Statement should be amended to provide a more coordinated description of how community life patterns will be changed because of the project.

The Heritage, Values & Well-Being Subcommittee is seriously concerned with human needs and the priority attached to them. Although the avowed purpose for deploying MX missiles is to preserve the national quality of life, local quality of life is being given relatively superficial attention. The Environmental Impact Statement precludes any conclusion that impacts on community well-being will be "high" by defining "high impact" as a situation in which similar changes have not occurred in the past. Neither local policy nor the Air Force impact studies demonstrate adequate concern with well-being issues.

Virtually all local human service agencies will be affected by the MX project. The number of transients, looking for work and requiring emergency shelter and food, will increase dramatically. As housing and other resources become scarce in relation to demand, inflationary pressures will seriously impact low- and fixed-income citizens. As employment opportunities increase, the pool of volunteers to assist in meeting human needs will be reduced. The Draft Environmental Impact Statement addresses these and other human needs, but does not provide for adequate mitigation given the anticipated extent of impacts. Furthermore, the Environmental Impact Statement does not recognize the fact that mitigation must be timely if it is to be effective. Changing the way services are provided takes time, yet the peak of impact is expected within three years. The Environmental Impact Statement must include recommendations for assuring that mitigation takes place when it is needed.

Human services in Cheyenne and Laramie County are unable to meet today's needs and will be overwhelmed by an increase in the pace of population growth. Human service providers must be able to respond to MX impact; three activities are essential in equipping them to do so.

First, there must be a clear understanding of what the community's human needs are and how they are being met. An immediate needs assessment is imperative. The assessment must include an honest appraisal of whether or not the community is fulfilling its responsibilities to its citizens.

Second, there must be continuous monitoring of changing needs and the ability of the community to deal with these changes. A permanent, ongoing monitoring system must be instituted. We commend the Air Force and its consultants for recognizing the importance of assessing needs and monitoring impacts in recommending both as mitigation measures in the Environmental Impact Statement.

Neither assessment nor monitoring, however, will mitigate impacts. There must be a way for the community to be sure it can cope, in time, with needs identified during assessment and monitoring. We recommend that a fund be established from which support for human services can be drawn when urgent needs are recognized. This is the most appropriate mitigation measure for issue areas in which the range of MX impacts is difficult to quantify. It allows the community to cope with change without overfunding some services and shortchanging others.

The Environmental Impact Statement should recommend that a draw-down fund be established as an integral part of the recommended monitoring program. The monitoring program and draw-down fund should be administered jointly by the Air Force and the local community. If both groups work together, the Air Force will be assured that mitigation monies are being spent in response to project-related impacts. The community will bear the responsibility for setting priorities and coordinating local services.

The assessment/monitoring/drawn-down fund process is one which should be considered for areas of impact other than human services as well. It provides a reasoned approach to dealing with impacts. This is preferable to requiring the community to guess what its needs will be before baseline needs are assessed and before the scope of the project is clarified.

The Environmental Impact Statement pays inadequate attention to the time after the peak of MX construction. Demands on human services will continue or increase during this period. (For example, nearly half of the Mental Health Center's clients are unemployed persons.) The monitoring system, including Air Force participation, will be essential to understanding problems arising during the "bust". The draw-down fund must be applicable to the post-construction period.

Decision-makers must be given the tools to manage change. The long-range implications of actions must be built into their day-to-day activities. Priorities are not being explicitly set; as a result, they are set by default. Because of the immediacy of the expected impact, we must clarify issues and set priorities now. Only by doing so can we assure that mitigation monies will be sufficient to deal with the most important issues and applied where they are needed. The Air Force should recognize this activity as central to the mitigation process and should focus attention on it, in the Environmental Impact Statement, as a mitigation measure.

In conclusion, the Subcommittee argues that a more direct approach to solving community problems needs to be followed. The focus must first be on the lives being affected, followed by a concerted effort to generate solutions meaningful at the personal level. The Air Force and local leadership, working together, must immediately create a forum to build a community consensus about impact issues.

Submitted by the
Heritage Values & Well-Being Subcommittee

Barbara Rogers, Chair

Lawrence Anderson
Rick Bryant
Pat Fleming
Jim Hecker
Ron Rogers
Joe Stewart
Robin Volk
Jo Parma, Staff

Lynn Birkerf.
Bill Dubois
Mary Guthrie
Shirley Kirkbride
Phil Roberts
Fr. Eugene Toud
Dennis Zocchi

HERITAGE, VALUES & WELL-BEING SUBCOMMITTEE
MAYOR'S IMPACT TEAM

Comments: Draft Environmental Impact Statement
Peacekeeper in Minuteman Silos

November 17, 1983

The Heritage, Values & Well-Being Subcommittee has reviewed in detail several sections of the DEIS. These sections are:

Social Well-Being
Public Finance (Human Services subsections)
Land Use

We have also made more general comments here relative to the Housing Section.

Social Well-Being

The definitions of levels of impact are not satisfactory. "High" impact is defined as a situation in which similar changes have not occurred in the past. This is foreign to common usage of the phrase "high impact" and results in a position from which no impact on well-being can be rated high. The Subcommittee recommends that the difference between "moderate" and "high" impact be one of degree: the degree to which resources will be adequate to deal with change.

The Subcommittee believes that the increase in number of transients/indigents due to the project will be unprecedented. Therefore, even if the impact definitions are not changed, impact from transients/indigents must be rated "high". The recommendation that a referral center be established for this population is a good one; however, more details are needed as to how transient services will actually be provided. There is presently a shortfall in the community's ability to serve this group. Mitigation recommendations must be specific about the way in which a new center will be able to handle a geometric increase in the problem.

Impacts on social well-being will not be confined to the short term. (Short term impacts by definition on page D-42, will decline when construction ends.) Indigents will stay on. Social alienation will continue and probably increase as previously employed people become unemployed. It cannot be assumed that unemployed people will out-migrate when the project is over (e.g., families, who will be dealing with children).

- 1 -

The DEIS concludes that the rate of social alienation may increase due to the project, but that the incidence of social problems will remain unchanged. The social problems cited (family violence, substance abuse) will surely rise in proportion to an increase in alienation.

Inflation is judged to be a short-term impact. The Subcommittee believes that it will be long-term as well. Prices are not likely to go down. As the number of unemployed persons rises, there will be more people with limited incomes. Furthermore, fixed- and low-income citizens will have to maintain debts incurred during the construction period after construction has ceased.

"Downturn problems" relative to the housing market and local businesses are cited as short-term impacts, but "negligible in the long run". The Subcommittee maintains that the impact has been understated. Past experience in the community demonstrates that the problems of over-built housing and over-expanded businesses will be most evident after construction. These problems will be with use for years, unless action is taken now to prevent them. An "information and coordination program" may help the mitigation process, but this is insufficient to deal with the magnitude and the extent of the impact. Mitigation recommendations must be expanded to provide some assurance that "bust" problems will be avoided.

The Subcommittee seeks assurance that the Air Force will not assume that potential "benefits" to social well-being will outweigh some of the project's adverse effects. In the first place, the issues are not closely related. Furthermore, the question whether an increased tax base and ability to provide more services will actually be a benefit. The countering may just create a bigger problem by creating a situation in which services must be reduced once citizens have higher expectations.

The DEIS also notes that an opportunity to "take innovative actions" will be a benefit from the project. This will not occur unless an approach to mitigation makes it happen. The mitigation section should include more direct discussion of this issue.

Increased use of volunteers to provide human services will not be a viable mitigation measure. It is true that this community benefits from an unusually high proportion of volunteer work. On the other hand, volunteers can only be stretched so far and it would be unfair to rely on volunteers to mitigate project related impacts.

Several mitigation measures can only work if local decision-makers are equipped to make decisions in a rapid-growth situation. An avenue for preparing them to deal with impact must be incorporated into the mitigation section.

The Subcommittee agrees with the DEIS's recognition of the importance of assessing needs and monitoring change. We emphasize again, however, that neither of these is actually a mitigation measure. The mitigation section should recommend that a fund, tied to the monitoring program, be established and administered jointly by the Air Force and the local community. This would be the most effective way to assure that there is the ability to respond to problems identified by the monitoring program.

While the concept of a draw-down fund appears controversial from the Air Force's point of view, it is the most reasonable approach to mitigation. By tying the use of the fund to monitoring, the Air Force can be assured that mitigation monies are spent in direct response to project-related impacts. By performing a needs assessment as part of the monitoring program, the community will realize that mitigation monies cannot be spent to make up for non-project-related shortfalls. By providing for joint administration of the fund, the community and the Air Force can reach a consensus about the responsibility of each to deal with identified problems. The fund should be large enough to provide timely response. Unspent monies should be returned to the Federal government.

A key aspect of the draw-down fund draws attention to a key concern of the Subcommittee. All mitigation measures must be timely to be effective. We are concerned that the mitigation section does not focus on this issue. The final EIS must be specific about the way in which the community will be assured that steps will be taken in time to work effectively.

Human Services

The DEIS states that nearly half of the Mental Health Center's clients are unemployed. Yet the project-related impact is defined as short-term. Since unemployment will rise dramatically, the long-term (post-construction) impacts on this and other human service agencies must be evaluated.

The Human Services section concludes that transient in-migration will have a low impact on services to this group. This is simply incorrect. Clearly the impacts will be substantial and clearly new facilities and staffing will be required. For virtually all of these agencies, any increase at all will require staffing and facilities. The definition of "low" impact is that no staffing or facilities would be required.

All human service impacts are rated short-term only. As discussed above, this is incorrect.

Land Use

The definitions of levels of impact for urban land use are incongruous. The DEIS assumes that impacts will be low or negligible if development controls have been adopted. There are only three criteria used to define land use impacts: the existence of development controls, depletion of vacant land and under-used developed land. While these criteria are important, they are off the mark when the general issue of land use is being considered. Land use is a quality of life issue. Questions to be addressed in a land use analysis should include:

- Will changes in land use patterns change the local quality of life, real or perceived?
- Will adequate land be available to meet needs into the future?
- Can project-related land use changes be managed to reduce personal disruption? to maintain the community's character? to promote local goals towards which the community is already working?

The definitions for rural land use impacts are more appropriate.

The issues listed for determination of significance are more useful. However, if these issues are used in the analyses, we fail to see how the DEIS concludes that there will be no significant land use impacts.

Since historic data demonstrate that existing land uses do not meet "generally accepted standards" and that standards have changed significantly over time, it is incorrect to assure that new growth will "require development according to those same standards." Also, why was it assumed that the

supply of vacant land in the City would remain constant? This assumption does not coincide with current policy which promotes infill.

On what basis was the project-related demand for 76 acres of mobile home development figured? With regard to housing and land use, the Subcommittee recommends that more alternatives be considered, instead of generating figures which may not be desirable from the community's point of view.

Underutilization of land depends on how needs are met. If peak demand is met through new subdivisions, underutilization will be a much larger problem than if infill policies are followed. Again, alternative scenarios would be much more useful in assessing impacts and defining mitigation. Furthermore, underutilization of land is already a significant community problem. A sizeable increase in the problem cannot be rated low and not significant.

Rural land use analysis doesn't recognize the important relationship between land use and quality of life. This must be built into the discussion.

The analysis of road alternative R1 impacts on land use is inadequate. In this "could open up access to land west of F.E. Warren Air Force Base," it will have a major impact on rural residential development. This is a serious concern that has been glossed over. The only impact mentioned is possible underutilization of the new interchange.

More detail is needed in the mitigation section. How and where would the temporary project worker facility be constructed? How would re-use be accomplished? When will construction on this facility begin? If the facility is to be an acceptable mitigation measure, planning for it must begin immediately. Conventional private development to accommodate the MX influx is already being planned. This increases the potential for greater negative impacts and decreases the chance for success of the recommended temporary facility.

The Subcommittee agrees that a monitoring program is essential to mitigation. We recommend again that the monitoring be tied to a system which will allow response to problems in time to be effective. A draw-down fund should be considered (see discussion of Social Well-Being).

What is the intent of the recommendation for "implementation of local...policies"? Is a change recommended here? The Subcommittee believes that the positions of decision-makers with regard to local policies should be strengthened. If this is the point, it should be clarified in the EIS.

It would be difficult for the community to successfully promote reclamation of a mobile home park for an alternative use within 6 months after the end of construction. The EIS must be more specific about how this would be accomplished and what the re-use would be.

There are a number of potential mitigation issues which should be considered here but are not. The possibility of tying a draw-down fund to the monitoring system should be discussed. "Alternative uses" are suggested in general but none are listed in particular. No effort has been made to provide assurance that mitigation measures will be taken in time to be effective.

Finally, the Land Use Section minimizes impacts. When more impacts are recognized as important (and they must be) it will be clear that more mitigation will be needed.

Housing

Decline cycle impacts for single-family housing must be considered long-term (as well as short-term), as the excess supply will certainly continue beyond 1990. The chart stops at 1990, but this cannot be used to assume that impacts will stop then. (Perhaps the time frame of the chart should be extended.)

Apparently the oversupply of mobile home units will continue for years beyond 1990. This will be a major problem for the community.

The impacts on tourist industry from project-related use of hotel/motel/campground units must be considered.

Beneficial effects due to sales value and rental income are temporary in nature. The higher the benefit over the short-term, the greater the long-term adverse impact. Citing a beneficial effect, then, clouds the picture and misleads the reader.

A better explanation of why impacts on multi-family housing will be low and not significant is needed.

What "incentives" should be provided to builders and developers? This general statement does not provide any constructive suggestions.

A "review" of "plans, policies and regulations for mobile home and recreational vehicle parks" is recommended. This is not mitigation in itself.

In conclusion, recommended mitigation measures are insufficient and the list is incomplete. Housing impacts are among the greatest, most significant, projected impacts. Yet mitigation recommendations would imply that little action needs to be taken. Surely more can be done than providing data, offering incentives, reviewing plans and considering a man-camp.

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City of Greeley

GREELEY CIVIC CENTER GREELEY COLORADO 80631 303 [illegible]

November 29, 1983

James F. Boatright
Deputy Assistant Secretary
of the Air Force
AFRCE-BMS/DEV
Norton AFB, CA 92409

Mr. Boatright:

The City of Greeley, Colorado, Planning staff has reviewed the Draft Environmental Impact Statement for the Peacekeeper in "Minuteman Silos project. The primary emphasis of this statement addresses the construction phase of the project. Noting that qualification, we generally concur that the proposed construction will not significantly impact our community.

One concern that we feel has not been adequately addressed relates to the potential impacts of transporting, by vehicle or railroad, hazardous materials or toxic chemicals through or nearby our community. This concern relates to both the construction and continuing operation phases of the project.

Obviously, the most effective mitigation technique for the short term immediate impact would be to limit the transport of these materials to rural, non-populated areas.

In the event that that mitigative technique is not feasible, the City requests that the transport of these materials comply with the maximum criteria as outlined in all City, State, and Federal regulations relating to the transport of toxic or hazardous materials. In addition, the City requests that the Federal Government provide special training to City personnel so that we are prepared to the maximum extent possible to deal with any potential accidents associated with the types of hazardous materials to be transported.

We appreciate the opportunity to review this document and welcome your response to the concern noted.

Sincerely,

Rebecca L. Safarik
Community Development
Director

RLS lm

J

poudre nuclear freeze campaign

629 South Howes Street Fort Collins, Colorado 80521 (303) 482-0639

To: The Department of the Air Force 11 27 83
From: The Poudre Nuclear Freeze Campaign
RE: Draft Environmental Impact Statement

On behalf of the members of the Poudre Nuclear Freeze Campaign (PNFC of Ft. Collins Colorado, we are submitting our response to the Draft Environmental Impact Statement (DEIS) and proposed deployment of the MX missile.

The purpose of the PNFC is to organize local community support for a bilateral nuclear weapons freeze, as well as to lobby governmental officials. The PNFC has a broad base of community support. It should be noted that a survey done by Colorado Representative Hank Brown found that 80% of the persons surveyed in Colorado's 4th Congressional District endorse a bilateral nuclear weapons freeze. Although we are only speaking directly for our membership, we feel that most of our neighbors have deep feelings on the issue of a nuclear weapons freeze and the deployment of the MX missile, which we believe violates the freeze concept.

The PNFC wishes to go on record by stating that the DEIS is an incomplete and inaccurate document.

In this statement we will direct our criticisms of the DEIS to the following specific areas:

1. The lack of EIS hearings in Ft. Collins or other effected localities.
2. The first-strike capabilities of the MX missile.
3. The escalation of the arms race due to the deployment of the MX missile.
4. The effect of a nuclear attack on MX missile sites.

Our first objection to the DEIS is that sufficient concern for the impact of the MX deployment on Ft. Collins and other Colorado localities was not demonstrated in this document. Ft. Collins was included within a "region of influence" in thirteen critical areas:

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Population and Employment, Housing, Public Services, Utilities, Energy, Transportation, Recreation, Cultural and Paleontological Resources, Water Resources, Biological Resources, Noise, and Air Quality. Detailed information as to what impacts Ft. Collins will experience and what mitigating techniques, if any, the government proposes to implement is glaringly absent. Also absent were any hearings in Ft. Collins. The residents of Ft. Collins were not given their right to early and open public meetings, despite repeated requests by Governor Lamm and several members of the Colorado Congressional delegation.

The concern over the absence of hearings in Ft. Collins was raised at the scoping hearings (appendix D, C-1). In response to this issue, the DEIS (appendix D.3, C-1), states that hearings were held in southeastern Wyoming and western Nebraska because they were the areas of deployment, but then completely fails to answer why they were not held in Colorado as well.

The argument implied in this response is that Colorado was excluded because the state is "only" an area of influence and not one of deployment. This rationale is illogical and has no substance in the context of the stated objectives of the *National Environmental* Protection Act, (NEPA), with regard to the consideration of impact areas.

Section 102 2), (E), of NEPA states, "[the purpose of this act is to] recognize the worldwide and long-range character of environmental problems and, where consistent with foreign policy of the US, lend appropriate support and initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of mankind's world environment".

Air Force and Administration officials have taken the attitude that the MX is essential for international peace and security. The MX, as we shall later argue, is not beneficial to the international community on any level. The MX is a destabilizing weapon which increases political tensions and the likelihood of nuclear war. It is imperative that broader national and international

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participation be included in this EIS.

The second objection the PNFC wishes to raise concerns the inaccuracies used in the descriptions of the MX missile. Appendix D.3, A-2, *states that the MX is not a first strike weapon.* This statement contradicts opinions of many experts in the field, including several Air Force and government officials, such as General Fairbourn (Ret.), Admiral Gene LaRocque(Ret.), and Herbert Scoville.

The MX is a highly accurate weapon designed, not to retaliate in the event of a Soviet first strike, but to destroy Soviet missiles before they have left their silos.

Scoville, former member of the CIA, and US Arms Control and Disarmament Agency official states, "The MX is so powerful and accurate that it is capable of destroying the Soviet's land-based force which is 75% of that nation's nuclear deterrent. The MX is specifically designed to threaten the Soviet deterrent and is not a serious threat unless it is used."

"The MX was supposedly designed to close the "window of vulnerability". However, the MX is now sited for deployment in vulnerable Minuteman silos. This means that the US will eventually have to adopt a launch on warning posture in order to insure the survivability of its MX missiles. The Soviets will then have to assume that the MX is designed not for deterrence,but as a potential first strike weapon. Should the Soviets respond by developing a first strike weapon of their own, as they no doubt will, then both superpowers will likely be placed in a "use-it or lose-it" situation during periods of international crisis.

Our third criticism is the DEIS inaccurate assessment of the impact of the MX missile as it relates to the escalation of the nuclear arms race. Section D.3, C-111, of the appendix states that, "The MX is essential to our national security and provides an incentive to the Soviets to negotiate equitable and verifiable agreements at reduced levels."

This type of reasoning, unfortunately, is not true. Any successful arms control must assume stability. Stability depends on mutually perceived deterrence. First strike capabilities undermine both stability and deterrence. Because of its first strike potential,

the MX is dangerously destabilizing and runs directly counter to the objectives of arms control.

As for the alleged necessity of the MX for national security, the DEIS again contains misleading information.

In the April edition of the Bulletin of Atomic Scientists, Zacharias, Fethjens, and Gordon state that we don't need any more nuclear weapons to meet the objectives of those concerned about the vulnerability of existing systems. "One large submarine loaded with missiles can obliterate a continent and provide a mighty, good deterrent. All weapons above and beyond the number that it takes to obliterate a continent for hundreds of years, a number that exists on our fleet of submarines, are not superior, they are superfluous."

The idea that the MX will be used to bargain arms control agreements is a contradiction to what the history of the arms race has shown. Again, Zacharias, Fethjens, and Gordon state, "We should know that our deployment of larger numbers of weapons is more likely to induce the Soviets to respond in kind than lead to arms control agreements, just as their building more weapons induces us to build more."

A final argument we feel particularly compelled to address, is the statement made on page I-6, "Some felt that the environmental impacts of a nuclear attack, particularly in the Deployment Area, ought to be included in this EIS. The effects of war are speculative and lie beyond the scope of Peacekeeper deployment and peacetime operations."

This statement is absurd. The effects of nuclear war are far from speculative. Scores of research documents from governments, agencies as well as studies from groups of scientists, physicians, educators and numerous other professionals, describe the horrendous and devastating effects which would result from a nuclear war.

Dr. Carl Sagan states, "Except for fools and madmen, everyone knows that nuclear war would be an unprecedented human catastrophe. In a 1-megaton explosion over a fairly large city, buildings would be vaporized, people reduced to ashes and shadows, outlying structures blown down like matchsticks and raging fires ignited. There are 50,000 nuclear weapons, more than 5,000 megatons of which, deployed in the arsenals of the United States and Soviet Union.

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which is sufficient to destroy a thousand cities.

Dr. Sagan estimates that up to 2 billion people would be destroyed in a nuclear war and the damage to the planet would be irreversible.

Such a misinformed and irresponsible attitude about the consequences of a nuclear war increases our belief that the government and Air Force officials do not really comprehend the nature of the beast that they are dealing with. Men with those in control, unable to realistically assess the risks involved, we are led to deduce that they must believe a nuclear war is winnable and they might be inclined to engage in a pre-emptive first strike during times of increased world tensions.

In conclusion, the PNFC believes that the DEIS is an unacceptable document. It fails to accurately assess and plan for the true impact that the deployment of the MX would have.

The cursory manner in which many crucial aspects of the MX issue were addressed, as well as inaccurate statements contained in the DEIS, leads us to doubt both the credibility and legality of this document. If the EIS process is going to be anything but a future exercise carried out merely for appearances sake, then the process must be opened up for much more extensive input and debate. The officials conducting the process need to treat all the concerns expressed at the scoping meetings, as well as subsequent hearings with full legitimacy. Lastly, if the DEIS process is to represent a meaningful exercise of the democratic process, then all alternatives, including a well stated argument for non-deployment of the MX, must be given equal weight.

We would like to express appreciation for being allowed the chance to have comments. We expect that the issues we have raised will be explored more completely in the final EIS.

Sincerely,

David Mayer
Susan M. Hierta
for Owners,

Representatives of the Puyallup Nuclear Freeze Campaign

K

United Way of LARAMIE COUNTY

Room 4th Majestic Bldg. P.O. Box 394 Ph. 635-3564 Cheyenne, Wyoming 82003

DEC 11 1983

AFRCE-BMS/DEV

NORTON AFB CA 92409

Re Comments regarding the Draft Environmental Impact Statement for Peacekeeper

Gentlemen

As the United Way is charged with the responsibility of raising funds from within our community to assist in the operations of our designated twenty-six agencies and each of our United Way Agencies provides a unique and needed service for our county, we believe that the United Way plays a key roll in assisting those in need and are concerned about the ability of the United Way to continue to raise the needed funds to provide the required expanded services under the proposed action. The impact on the ability of the United Way to raise increased needed monies must be reviewed.

Only a very select few of our United Way Agencies have been described and reviewed in the EIS. It is our request that all United Way Agencies be fully reviewed as to their ability to provide and fund their community services under the proposed project.

We also request documentation that the transient immigrate "will impact to a ...w extent" our United Way Agencies as indicated on page 3-10. Many of our agencies are overstended as to their financial and volunteer resources to meet their current needs and the EIS should address how the expanded services under the proposed project will be handled other than relating it to our successful Frontier Days volunteer effort.

Mitigation should also address concepts such as the Boeing Trust Fund that was given to the United Way to assist in funding during the Minute Man Missile development.

Timing must also be addressed, as many of the transient immigrates have already arrived due to the announcement of the project. Many of our agencies are providing limited services today to these people in need. This has reduced their overall level of services due to their limited resources.

In general, all United Way Agencies must be reviewed along with the United Way itself to determine if the depth of our local volunteer financial resources can continue to support the expanded need due to the project.

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The United Way Executive Committee and executive director should be consulted regarding mitigation measures that should be considered.

Member agencies that should be reviewed are:

AMERICAN CANCER SOCIETY
ATTENTION HOME
BOY SCOUTS
CHEYENNE CHILD CARE CENTERS, INC.
CHEYENNE FAMILY YMCA
GIRL SCOUTS
GOODWILL OF WYOMING
HELP LINE
MAGIC CITY ENTERPRISES
MEALS ON WHEELS
NEEDS, INC.
ONE-TO-ONE TUTORING
OPERATION WARMHEART
RED CROSS
RETARDED CITIZENS ASSOCIATION
RHEUMATIC FEVER PREVENTION SOCIETY
SAFE HOUSE-COMMUNITY CENTER ON DOMESTIC VIOLENCE
SALVATION ARMY
SOUTHEAST WYO MENTAL HEALTH CENTER
SPECIAL FRIENDS
SPECIAL NEEDS
STRIDE LEARNING CENTER
U.S.O.
VOLUNTEER INFORMATION CENTER
WAFB YOUTH ACTIVITIES
Y.W.C.A.

Yours truly

Vernie Martin, President

December 12, 1983

cc United Way Agencies
Senator Alan Simpson
Senator Malcom Wallop
Representative Dick Cheney
URS/Berger

L

10h S. 4th Street, Room 205
Laramie, WY 82070
9 December 1983

AFRCE-BMS/DEV
Norton Air Force Base, CA 92409

To Whom It May Concern:

Attached please find the comments of Dr. Larry Ostreuh regarding certain portions of the Draft Environmental Impact Statement, MX in Minuteman Silos. Dr. Ostreuh prepared these comments on behalf of the Wyoming Nuclear Weapons Freeze Coalition.

We realize that these comments are being submitted after the stated deadline of 28 November 1983, but we respectfully request that they be accepted anyway since today marks the end of a comment period of 45 business days.

Sincerely,

Sarah Gavin Jones

Sarah Gavin Jones, Chair
Wyo. Nuclear Weapons Freeze Coalition

M

NORTHWESTERN UNIVERSITY COLLEGE OF ARTS AND SCIENCES

Department of Anthropology

Evanston, Illinois 60201
Telephone (312) 492-5402

December 20, 1983

Major Peter Walsh
United States Air Force--BMS/DEV
Norton Air Force Base
California 92409

Dear Major Walsh:

I have just received a copy of a long letter/review written by Jon Hannil concerning a Draft Environmental Report for the Peacekeeper Minuteman Silos in Wyoming. Although I do not know the area referenced, I have some experience with the profession of archaeology and of the politics of similar situations. I would like to offer a few observations which will, I hope, be of interest to you.

First of all, the relevant compliance for you all is not with any federal legislation, but is instead with Department of Interior policies. These policies state that you must consult with Native Americans, which you appear to have done: the Cheyenne and Arapaho. Assuming that individuals whom you consulted were appropriate representatives, then the burden of proof is really upon AIM to prove that they are more appropriate persons to speak for Native Americans in this instance. This is a familiar problem: who is the appropriate representative to speak for Indians. However, my reading of Hannil's comments suggests that you have indeed complied with Department of Interior policies and it would be up to AIM to prove otherwise.

In reference to "sacred sites," it is my understanding that only those sites are deemed sacred which can be shown to have been of continued and historical importance. These must be sacred within an established Indian tradition. New sacred sites cannot be established based upon beliefs which began only within recent weeks, months, or years. Historical traditional importance must be established.

Specifically, in reference to the reburial of human skeletal remains, this is mandated only if a direct and clear degree of relationship to living individuals has been established. While one may agree with AIM that it would be best not to disturb burial sites, there is no legal mandate to rebury all remains. You should be aware that the views enunciated reburial reflected in the third paragraph on Page 4 do not necessarily reflect opinion other than that of AIM and Hannil. Numerous Indians, as well as the archaeological profession, take an opposing stance.

I hope these thoughts will be of use to you. Please let me know if you would like further input in this matter. I enclose a copy of an article which might also be of interest.

Sincerely,

John E. Ehrenberg
Professor

Enc.

SOCIETY FOR CALIFORNIA ARCHAEOLOGY

NEWSLETTER

Volume 17 Number 1 February

Making The Past A Part Of Our Present... Essays On Archaeology

EDITORIAL: NOW WE ALL LOSE

--An Archaeologist's Opinion--

Nearly fifteen years ago, I attended a meeting of professional archaeologists where a significant portion of the business meeting was devoted to discussion of the reburial issue. Although various points of view were expressed, it was clear to me--then a graduate student--that the majority opinion was in favor of supporting archaeologically reinvestigated human remains in Native American open ground. A corollary was that there should be no formal stand taken by the profession. Perhaps if we ignored the issue it would go away. And so we did, I have not gone away. Professionals remains have been reinterred in ever-larger coffins in the Bakersfield overloaded prehistoric skeletons returned to the earth in peace? Nope in California, and given great have been requested for reburial as well. In California known who also have a reputation of going to register the bones of Del Mar Man, a find claimed by some to be 50,000 years old and the oldest human remains in the New World. According to the International attention, we find them in Australia there is pressure against excavation and curation of Lake Pleistocene remains. Proposed material on that continent is to include even those that contain materials and there have been discussions of cremating all remains before reinterment. Other parallel cases could be cited.

In archaeologists, we have been reasonably unwilling to engage in direct and public discussion of the reburial issue. We are scientists and in general tend to ignore the public scene. We have tended to talk only with each other, and we should not therefore be surprised that there is little general appreciation of the thrust of reburial upon archaeological research. And archaeologists have certainly avoided having a stand upon the topic--until, that is, many new Indian pots, palace, skeletal remains and field notes disappearing out the laboratory door. Underlying this is a greater problem: the failure of archaeologists to present their work to the public. It is clear that talking informed, in a positive way, and communicating what we do to the public especially to Native Americans is important and indeed a professional responsibility. This goes far beyond the issue of reburial. It simply is vital that we educate beyond the boundaries of our profession.

Removal of archaeologically preserved resources is a subject which is of more than scientific importance and which is being discussed at a number of levels: scientific, to be certain, but there are also significant political and emotional aspects of the problem. We must remember that we are talking about an issue whose resolution could potentially set severe limits upon the way in which the past is revealed and who may study it. Indeed, in the broader context we are talking about the control of knowledge, period. Our specific case is the knowledge of mankind's past. Although the issue is not normally framed in terms of question: a site, a skeleton, a cluster of grave goods, we must recognize the broader significance of the problem and that its solution could come to the profession of archaeology. The need for a strong stand by the archaeological profession, for the profession, is crucial.

Another important point is that although I will be dealing here primarily with implications for human skeletal study, archaeologists with other specialities remains offered to lessen the reburial issue for at least three good reasons: 1) In truth there are very few archaeological research designs which would not be significantly enhanced through the analysis of appropriate human skeletal samples; 2) Crucially part: the pots are palate go with the bones; in other words, the artifacts and other archaeologically preserved materials as well as field notes are being requested for reinterment; and 3) not as card-carrying members of the archaeological profession, we have an ethical responsibility to the archaeological record.

The research project that I shall reference later in this paper developed from my interest in the reburial topic. I was aware of many simply naive or less kindly--false assumptions which had been made in the heat of battle. For instance, it was stated that white archaeologists never studied their own ancestors. This allegation is of course untrue. In many European lands, archaeologists are research, study, and curate very recent burials--even those less than a century old. North American archaeologists have engaged in study of cemeteries of historic whites and blacks, and the large cadaver-derived series located in Cleveland and in Washington, D. C. have assumed major significance in anthropological study. The latter are comprised nearly exclusively of blac and whites, not Indians. In truth, the archaeological study of one's heritage is a general phenomenon, with the picture in North America being obscured because the vast majority of pre- and proto-historic sites do not contain formally organized. Our period of written history is very brief and for this reason archaeologists have tended to emphasize the truly anthropological prehistoric period. This should not be construed as a racist preoccupation, quite the contrary. In fact, there are many archaeologists who have made a career dedication to concentrate upon exploring the proud heritage of Native particularly Peruvians there is no other way to systematically acquire this knowledge. The issue remains: who has the right to control or limit access or destroy access to this knowledge?

Also significant is the fact that study of archaeologically preserved human remains has benefited not only anthropological scholars, but has also provided crucial standards for scientists who work with the public in the course of functionally important duties. Throughout law enforcement agencies, the problem of reasonably deceased individuals, either as isolated skeletons--bones, for example--or even skeletons of known deceased individuals, is a frequent and recurring problem. Many of the techniques used to establish the identity of an dead or victims of air accidents were developed and/or refined through the examination of prepared remains from North America. Both historic and prehistoric skeletal samples have also been used in educating medical and dental students concerning bone biology and human variation.

Another frequent allegation is the notion that the sentimental attention of human skeletal collections is not important in anthropological study. One quotation which epitomizes this genre is the following, taken from the beginning of a site report: "The bones were in the shooting schools, the archaeologists and the anthropologists dissect them, the bones have been placed alone of "scientific items"--some or even? I must admit that I appreciate this allegation with mixed feelings. Like many contemporary archaeologists, I, too am an intellectual child of the '60s and the "new archaeology" taught me quite clearly that the "new" and exciting questions of the "new archaeology" rendered equally shiny and "new" collections. Just how useful are the older collections?

A particularly striking illustration to me of the possible consequences of reburial comes from a consideration of the ways in which contemporary archaeological study would be impacted if the issue had arisen in 1952 and if the resolution had been favorable reburial after "complete" study in the fashion of the time. This model contains--quite realistically--that no problem-oriented (only "salvage") excavation had occurred in the interim.

I think it is safe to assume that under this model, our data base would primarily be published reports and such private records as were accessible. Over this period, given the experiences, many private records would have become lost or severely damaged, so the published reports would be the primary focus. Further, for large skeletal series would have been reinterred and studied since 1952, given the events against such work. As a point of departure, we should note that population biology was only beginning to impact human archaeological study of archaeological collections in the 1950s. A typological perspective characterizes most work published in the first part of this century.

There are five topics commonly addressed by human archaeologists which are of central concern to archaeologists. These are the social dimensions of mortuary behavior, demography, biological (genetic) relationships, health and disease, and diet. Let us consider how our 1952 prospective might have been affected by the partially enforced reburial policy of 1952.

Since 1970 and in subsequent years many archaeologists have become interested in the social implications of mortuary behavior, a basic assumption, formulated in the study of burial practices in contemporary societies, is that social complexity can be measured in terms of the number of distinctions ordinarily available to members of a specific age/sex category. Necessary for this kind of study is information about age, sex, and the degree to which other biological characterization vary although a given cemetery. Prior to 1952, most archaeological data had been presented as summary statistics, published separately from archaeological data, if at all. Consequently, the investigator who had the pleasure of trying to associate summary and descriptions from an archaeological site report with those used by physical anthropologists is fond of should may appreciate the importance of this point, and the necessity of being able to check photographic records of association against the actual skeletons. It would be difficult, and in many cases impossible to maintain variability in burial treatment without the ability to return to curated collections of skeletal remains.

The accuracy of pre-1952 techniques for estimating sex and age-at-death is another interesting consideration. In 1952, physical anthropologists tended to estimate age-at-death by endo-cranial suture closure; public archaeologists were not widely acquainted and so on. And yet elaborated the manual of skeletal discrepancy methods, which we now have are vastly more accurate. In addition, we have become interested in how sexual dimorphism may have affected health and/or diet. Our 1952 reports would not allow us even to approach this problem.

Demography is, of course, a truly important topic in and of itself, increasingly significant to archaeologists as ecological models have assumed

problemsome. As noted above, techniques for estimating age have been refined markedly since 1952, as have methods for sex diagnosis. The possibility of estimating sex for immature remains, significant demographically as well as for social dimensions questions, is now apparent. In 1952 juvenile remains were generally considered to be important. They were infrequently collected systematically, and--if collected--inadequately described. So we have that juvenile mortality patterns as well as infant health status can be among the most sensitive indicators available concerning the ancient quality of life. This knowledge, however provocative, would be anathema to the reburial archaeologist or archaeologist constrained by the pre-1952 data base.

A "hot topic" for archaeological investigations in 1952 was the problem of genetic origin for native Americans. Biological relationship was usually considered, usually from the perspective of a selected subsample of adult male skulls for whom certain anatomy could be measured along with morphological observations. Data for individuals was not reported. Most high speed computers had not yet facilitated multivariate examination, only summary of essential statistics are to be found in the published literature. Quite frankly, I have nightmares about attempting to make sense of the generalized summary of measurement and dehumanization. Just what is the shape of a moderately ovoid skull?

Dental measurements and observations are considerably reported for the pre-1952 period, and are an excellent repository trait in quantifiable biological distance studies are yet in the future. The primary records, as noted here, present little harm. There is significant amount of the skeletal series. Interpretations from females, from sexually selected, from individuals of known age, and from individuals of known social characteristics for example, parental, and especially preserved diseases would be missing. We need for improved biology. Why pedes have to be that archaeologists and physical anthropologists were more similar thirty years ago, than by the contrary. Today, however, part is an history, and archaeologists are now seeking to reconstruct theories and methods, environmental reasons, adaptive strategy, economical, and behavioral patterns through osteological analysis. Building upon prior studies. Find the achievements, in new techniques and perspectives of course, requires resources to the objects and field notes originally studied (would normally be reburied.)

For North American collections, osteometrics was unfortunately reported by 1952. Then reported, sometimes were diagnosed without description, which severely limits reinterpretation and the application of more sophisticated methodologies. Of those that were described, many were inadequately described to allow for comparison of data to replicate the work of Del Mar Man. A find claimed by some to be 50,000 years old and the oldest human remains in the New World. According to the International attention, we find them in Australia there is pressure against excavation and curation of Lake Pleistocene remains. Proposed material on that continent is to include even those that contain materials and there have been discussions of cremating all remains before reinterment. Other parallel cases could be cited.

In archaeologists, we have been reasonably unwilling to engage in direct and public discussion of the reburial issue. We are scientists and in general tend to ignore the public scene. We have tended to talk only with each other, and we should not therefore be surprised that there is little general appreciation of the thrust of reburial upon archaeological research. And archaeologists have certainly avoided having a stand upon the topic--until, that is, many new Indian

which allow us to make dietary inferences from the analysis of human skeletal tissues. These element study, such as the analysis of stable strontium, can provide a perspective upon the relative amount of animal protein consumed within human groups. Interesting connections are important as well. The organic fraction of the bone contains significances as a clue to the presence of tropical pathogens such as malaria in the prehistoric diet. The development of maize agriculture in Eastern North America has finally been charted through this analysis, as have maladies which could not have been available had a 1952 reburial policy been enforced. Similar techniques have proved important in California studies of marine resource utilization.

At this point it may appear that I have painted an extreme picture and it is possible that a few informants may reflect a "worse case" model. However, we must accept the fact that if the policies which are being considered are in place now continued to prevail, our ability to interpret the human biological past will be limited in the year 2012 to a 1952 perspective. We have come how considerable a 1952 perspective appeared in 1952. Will this model be any less true 30 years hence?

In considering the reburial issue, it is absolutely crucial that archaeologists--even those of us who are children of the "Boy-Scout" variety of current educational scheme. If we are truly interested in truly discipline, we must realize that methods and theories and data will continue to change, just as they have in the past. Our responsibility to preserve data base for future generations of scholars assumes paramount importance in this regard.

Another oft-cited allegation states that all archaeological collections are not used and therefore are not worthy examples of curation. Although this seems intuitively appealing, it does not withstand the need for continued re-evaluation and reinterpretation of the past. Some have no way existence, there exists little hope that the data contained in them will be of any significance. The need for that objective enquiry led a generation of archaeologists to engage in a study of the old museum and museum collections, including those assembled and initially studied many years in the past ago. Our newly formed view existed published in the Museum of New Mexico Papers in Anthropology (Nos. 1 and 1951). We noted that both defined collections which are not considered, and, as well as the subject of the research problem. Present orientations and the nature of collections research, and, as did the application and development of new analytical techniques.

One of our most startling results was the finding applied to re-analysis of "old" collections. Another significant point derived from these studies was the fact that the Glendenning Archaeological Society, and the Glendenning Archaeological Society, and the Glendenning Archaeological Society, and

3427 Dover Road
Cheyenne, WY 82001
December 2, 1983

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Mr. Richard Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Re: Comment on Draft Peacekeeper EIS

Dear Mr. Hartman:

Some time ago I was asked to comment on the Draft Peacekeeper EIS as an official employee of the State of Wyoming.

Please accept and transmit the enclosed additional comment I wish to make as a local citizen, which was viewed as not appropriate for my official position.

Very truly yours,

John D. Erdmann

Encl.

Overall Comment Regarding Civil Defense Preparedness

Citing the "Jackson Amendment" to the 1983 Department of Defense Appropriation Act (P.L. 97-377, 96 Stat. 1833, 1846-48), the draft EIS states on p. 1-6:

> "Another general issue to emerge from the scoping meetings was the concern that deployment of the Peacekeeper missile might induce a nuclear strike from an enemy in time of international tension. Some felt that the environmental impacts of a nuclear attack, particularly in the Deployment Area, ought to be included in this EIS. The effects of war are speculative and live beyond the scope of peacekeeper deployment and peacetime operations. They are therefore not dealt with in this document."

This refusal to discuss the very real threats created or enlarged by this weapons system does a grave disservice to the citizens in the affected area. Although the deployment decision and matters having to do with national defense and global nuclear war strategy may be beyond the scope of the EIS, the people whose very lives may weigh in the balance deserve to know what protective measures are available to them. While some may indicate that they would just as soon be at ground zero if war does happen, there are a growing number who realize that the possibility is real and that personal action or inaction can make the difference between survival and death, or worse, a lingering death from radiation exposure.

Cursory research in the unclassified publications on the effects of thermonuclear weapons reveals what persons in the Cheyenne area might expect from a low air burst over F. E. Warren Air Force Base: If outside the immediate fireball and vaporized crater, and if shielded from the thermal flash and direct, line-of-sight gamma radiation, the next most devastating forces would be the associated pressure wave and the winds which follow. For someone who is lucky enough to be below the ground surface one half mile away from a one megaton blast, he should expect pressures on the order of 600 pounds per square inch at the surface for three seconds and winds overhead in excess of four hundred miles per hour. With either a smaller blast or increased distance the effects would be less severe. But even these forces, and certainly the later fallout radiation, can be handled with enough foresight and planning, such that many, if not most, of the witnesses to the event would survive in good health.

The research shows that arched or domed structures located a few feet below the earth's surface, with sufficient blockage in the connecting air passageways, can protect the occupants, provided that they are beyond the crater fracture zone. This type of information should be made public and widely advertised through the EIS and any other publications dealing with the Peacekeeper.

The existing civil defense plan for the affected area is based upon the hope that most of the population can be evacuated to safer areas should there be two or three days warning. However, not everybody would be able to move so fast and some would choose to stay for any number of reasons. The Air Force and the Civil Defense authorities should explain in detail how these citizens can attempt to protect themselves. The refusal to do so is inexcusable.

November 30, 1983

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Major Peter [illegible]
AFRCE - BMS [illegible]
Norton AFB, CA 92409

Dear Major Walsh,

I have just been informed about the Draft Environmental Report for the Peacekeeper Minutemen Silos in relationship to the American Indians Against Desecration.

I was disillusioned in discovering that the American Indians who have an interest in the location were not properly considered in this issue.

I support the 1868 Fort Laramie Treaty and believe quite strongly that the 1871 treaty is invalid as not enough adult males signed the 1871 treaty to make it a valid document.

I urge you to investigate more accurately when an archaeological site is in question and to contact ALL of the qualified Indians involved from the several tribes which do indeed have an interest still in the Land, especially at FE Warren AFB.

The fact that the authors of the environmental report failed to consult with the Lakota Nation shows me that they either knew very little about the history of this land or that they ignored the Lakota Nation on purpose.

I have supported the 1868 Ft. Laramie Treaty and am interested in what happens in the area that falls under that Treaty.

I also support Jan Hamil, Director of A.I.D., and I can assure you she is a good person to work with and will do everything in her power to work with you. Her goals are obvious and she works hard for her people.

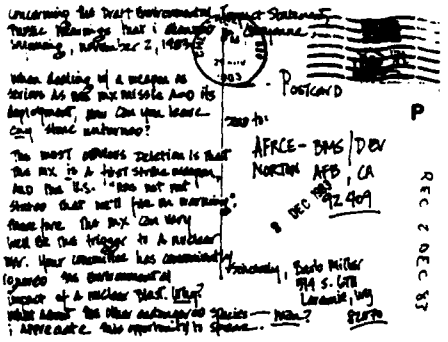
My hope is that you will be able to work together to help correct any archaeological problems and to protect those lands which are sacred to the Indians.

Sincerely,

Sandee Krueger

Sandee Krueger
1791 N. Geoffrey Ave.
Simi Valley, CA 93063

cc: Jan Hamil



December 15,1983

COMMENTS ON THE MX EIS

Q

There are two serious errors in the section on social well-being (page 3-82 to page 3-91).

1. Surplus job seekers: the EIS states that in the short term, surplus job seekers will be a critical problem, but that in the long term they will not pose a problem. This contradicts elementary labor migration theory, common sense, and the experience of most other boom communities: once the construction period ends and lay-offs begin, there is a protracted period of unemployment, that is, "surplus job seekers".

1. Social problems: the EIS correctly states that social problems will be critical in the short term. However, it ignores the likelihood that social problems will be critical in the long term as well because of the above mentioned unemployment. Depression, marital discord, and alcoholism frequently accompany unemployment.

Dr. Lawrence M. Ostresh, Jr.
Chairman, Department of Geography
University of Wyoming
Laramie, WY 82071

6.4 Public Hearing Registrants Who Did Not Comment

A number of people who registered at the public hearings were unable to speak due to time limits or did not choose to give verbal testimony or submit written comments. These persons are listed below. A copy of the FEIS was sent to these registrants.

Audubon Society
High Plains Chapter
Mary Purdy
President
Cheyenne, WY

City of Cheyenne
City Council
Joan C. Clark
Councilman
Cheyenne, WY

City of Cheyenne
Mayor's Impact Team
B.G. MacNabb
Cheyenne, Wy

Dale Anderson
Chadron, NE

Doris Brown
Harrisburg, NE

Fred Dick
Laramie, WY

Philip Dick
Laramie, WY

James Ellison
Gering, NE

Pastor Thomas Fraser
Mitchell, NE

Sandy Fuller
Torrington, WY

Mary Guthrie
Cheyenne, WY

Byrle Hopkins
Scottsbluff, NE

Steven J. Keogh
Torrington, WY

Carole J. Kinney
Torrington, WY

Lenore Miles
Kimball, NE

Carl Mortenson
Kimball, NE

Gary Ruzicka
Pine Bluffs, WY

Carolann Simpson
Cheyenne, WY

Connie Soule
Harrisburg, NE

Tibbie Stogsdill
Cheyenne, WY



7.0 ISSUES AND RESPONSES

7.1 *Introduction*

This section contains a catalog of the issues identified in documents received during the public review and comment period and responses to those issues. Issues are listed numerically according to issue code number. Issue codes are shown on each document in Section 6.2.

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ISSUE CODE	ISSUE TEXT	RESPONSE TEXT
1	No comment/contents adequate/comments for consideration.	Noted.
2	Cover letter for enclosed documents.	Noted.
3	What was the cost of preparing the DEIS?	The cost of preparing the DEIS was approximately $5 million.
4	Describe the purpose, review, and use of the EIS.	This issue is addressed in Section 1.1, Section 1.7, and Section 4.0 of the FEIS.
5	The Air Force must fully disclose all impacts to improve its credibility.	The FEIS has been completed to meet all requirements of NEPA. It is sufficiently detailed to provide an understanding of the significant environmental issues while not burdening the reader with all the backup material required for the analysis. Thirteen EPTRs have been published to provide additional detail to those who are interested. The EPTRs are available for review at the offices of city and county clerks and at public libraries in the deployment area. Copies of the EPTRs can be requested from the Air Force at AFRCE-BMS/DEV, Norton AFB, CA 92409.
6	A revised DEIS, under CFR Section 1502.9 should be prepared since the draft EIS is grossly inadequate in terms of description and interpretation of impact on human and natural resources.	The DEIS was prepared in a way that allowed meaningful analysis of the possible impacts of the project and its alternatives, in accordance with CEQ regulations. Therefore, a revised draft is not required.
7	Specific Wyoming state agency concerns related to adequacy of baseline information, inaccuracy and lack of specificity in the project impact projections and lack of methodological documentation must be resolved among authors, consultants, and state officials as soon as possible.	The Air Force initiated a number of meetings with state and local government officials to review and resolve concerns throughout the EIS process, and another comprehensive review of the DEIS would not be productive. The Air Force is committed to explaining analysis results and discussing mitigation options with the agencies responsible for their implementation.
8	A revised DEIS that comprehensively considers the effects of the project on Colorado should be prepared.	The DEIS used Regions of Influence as study areas. The Region of Influence for each environmental resource was determined through an analytic process. A majority of the Regions of Influence include portions of Colorado, and the regional

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		impacts that were discovered in Colorado were given the same consideration as regional impacts located in other states. The Areas of Concentrated Study, where most impacts are located, are typically in the immediate vicinity of silos and the support base and therefore do not extend any significant distance into Colorado. Consequently, the DEIS adequately addressed the impact of the Peacekeeper project on Colorado.
9	Page 2-10, Section 2-2 and page 1-1, Section 1-1 of the Draft Jurisdictional EPTR are inconsistent concerning coverage of Colorado in the report.	While the report does not cover Colorado communities specifically, that is not to say that workers residing in the Region of Influence would not come from Colorado especially since the main gate to the Air Force base is only slightly more than 10 miles north of the state line and accessible by a major interstate highway.
10	The comments submitted at scoping meetings were not adequately addressed or documented in the DEIS.	The environmental scoping process was undertaken to identify the significant issues for study in the EIS and to determine the scope of research for these issues. A good faith effort was made to identify, address, and document significant issues raised in the scoping process. For further information, please see Appendix D of the FEIS.
11	Scoping meetings should have been held in Scottsbluff and Gering, Nebraska.	This issue is addressed in Section 1.3.5 of the FEIS.
12	The Air Force hindered the public participation process by holding seven scoping meetings in five days and giving less than two weeks notice of the times and location of hearings.	The Air Force attempted to encourage public participation in the scoping process. Notification of scoping meetings was made two weeks before the meetings were held. A total of 19 newspapers in Wyoming, Nebraska, and Colorado, and 15 radio and television stations in Wyoming and Nebraska were notified of the hearings. The Air Force scheduled public scoping meetings in appropriate locations and at varying times in order to solicit views of the interested public. In a like manner, the Air Force made every attempt to promote public awareness of the meetings.
13	The scoping meetings were an exercise in intimidation and frustration, since the Air Force inhibited free discussion and refused to respect	The scoping meetings were structured to promote the identification and discussion of technical issues to be addressed in the DEIS. The

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	the request that the hearing not be broken into 11 small groups. These actions violate the intent of NEPA.	small group discussion/workshop format was selected to enhance the identification of significant resource issues and the open and free discussion of these candidate issues, as recommended by CEQ guidance on the scoping process.
14	The Air Force did not hold scoping meetings in Colorado, even though the Peacekeeper will be based just across Colorado's borders. Colorado's governor, other government officials, and citizens requested that the Air Force hold scoping meetings in Colorado.	This issue is addressed in Sections 1.3.5 and 4.0 of the FEIS.
15	The Air Force has taken advantage of uninformed residents and misrepresented the facts. The Air Force has not taken seriously its obligation to involve the public and provide public information about the project. This inhibited full public discussion of the proposed action renders the DEIS invalid. A revised DEIS should be prepared.	The Air Force informed residents in the communities in the project area about the Peacekeeper system. As additional information about the project became known, this information was generally made known to the public through press releases as well as briefings by military officers to the public in those communities. This issue is addressed in Section 1.3.5 of the FEIS.
16	The format of the public hearings did not allow sufficient time for all in attendance to present comments. Too much time was allocated to the Air Force presentation. Because the format was intimidating, some people were discouraged from presenting their view.	The Air Force presentation involved an overview of the project description and the results of the environmental analysis. Following the presentation, government officials and private citizens were invited to ask questions and make comments. Each person was requested to limit statements to 5 minutes to permit maximum participation. The audience was informed that comments which could not be made during the meeting because of time constraints could be given as written statements. Such statements were given the same attention as those received verbally.
17	Documents were received too late in the comment period to allow for sufficient review.	The DEIS was released on October 14, 1983 for a 45-day public review and comment period. The Notice of Availablity was in a "Federal Register" notice on that date. News releases were published and press conferences were held prior to October 14, 1983 to increase public awareness of the availablity of the DEIS. The document was distributed to federal, state, and local government agencies; city/county, and college/

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		university libraries; individuals who submitted written comments during the scoping process; interested citizen groups and organizations; and interested parties who requested a copy. The document was made available to the general public by providing a number of copies to the libraries and city/county clerks' offices within the study area at the beginning of the comment period, on October 14, 1983. The document was also made available to anyone requesting a copy throughout the review period. Documents were distributed to those persons within one day of receipt of their request.
18	Public notification of public hearings was not adequate.	The Air Force published notification of public hearings in the "Federal Register" as required by CEQ regulations. Notification of the hearings was also carried in the news media in the project area, as recommended by the CEQ regulations.
19	Public hearings should have been held at the end of the public comment period rather than at the beginning of the comment period. Too many public hearings were scheduled over a very short period of time. The hearings were also scheduled at inconvenient times of day.	The Air Force attempted to schedule as many hearings as possible at varying times and in many locations in the Deployment Area to solicit views of the interested public within the confines of the January 31, 1984 deadline established by Congress.
20	The public hearings were not fair since the presentations and the Air Force personnel were biased.	The Air Force attempted to conduct the hearings in a fair and unbiased manner. An Air Force judge, who had not previously been involved in the Peacekeeper in Minuteman silos project, presided over the hearings. The Air Force Briefing Team chief presented a factual review of the project and the major findings in the DEIS. Following this presentation, government officals and private citizens were invited to ask questions of an Air Force team of experts or to make comments. All questions and comments are included in this FEIS.
21	The Air Force should hold public hearings in Salt Lake City, Ogden, and Brigham City, Utah because Peacekeeper production centers are located in these communities.	The Air Force held public hearings in those locations where measurable direct project effects were projected to occur. This issue is addressed in Section 1.3.5 of the FEIS.
22	There should be full public hearings in Colorado, in addition to Wyoming and Nebraska, prior to	The Air Force held public hearings in those locations where measurable direct project effects

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	issuing of a Record of Decision.	were projected to occur. This issue is addressed in Section 1.3.5 of the FEIS.
23	The comment period should be extended.	This issue is addressed in Section 1.3.5 of the FEIS.
24	The DEIS and the supporting documents were not available to all interested parties, especially those just outside the deployment area boundaries.	The DEIS was filed with the EPA on October 7, 1983. On that date notices were provided to news media throughout the deployment area. Notice of availability of the document was published on October 14, 1983. This began the 45-day review and comment period. Documents were available at libraries throughout the impact area. Furthermore, documents were sent to all persons or organizations which had expressed interest in the project, and were available upon request.
25	The cost of preparing and mailing the DEIS is excessive.	Noted.
26	The EPTRs were not available to Western Nebraskans or Coloradans.	The EPTRs were distributed on October 11 through 13, 1983 in order to be available at the beginning of the comment period. All county clerks, in addition to city clerks, and numerous libraries in the Region of Influence were provided with copies of the EPTR. In addition, EPTRs were sent to state and college libraries in Wyoming, Nebraska, and Colorado. All interested parties were welcome to request copies of the EPTR from the Air Force.
27	Neither the DEIS nor an Executive Summary was available in Colorado.	The DEIS, which includes the Executive Summary, was sent to federal agencies, university libraries in Fort Collins and Boulder, citizens organizations and persons from Colorado who submitted written comments during the scoping period, as well as interested parties who requested copies. The DEIS was available to the public, as stated in the Notice of Availability, by requesting a copy from the Air Force at AFRCE-BMS/DEV, Norton AFB, CA 92409.
28	The DEIS was not sent to the Northern Cheyenne, Shoshone, Commanche, Crow, Plains Apache, Kiowa Arapaho, or Teton Sioux tribal councils, or to American Indians Against	That is correct. The October 14, 1983 distribution of the DEIS did not include the identified tribal Councils or the American Indians Against Desecration. This is because the analysis

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	Desecration.	incorporated in the DEIS did not indicate that the project would affect any of these groups, and because they did not request a copy of the document.
29	How will the DEIS comments be addressed in the EIS process and when will the FEIS be available to citizens in the study area?	All written comments and questions regarding the DEIS have been reviewed and analyzed. The FEIS has been amended to reflect these comments. Volume II of the FEIS contains all comments and questions with corresponding answers provided by the Air Force. The FEIS was distributed to all who received or commented on the DEIS or the Draft Jurisdictional EPTR, to all those who registered at the public hearings, and to all those who requested the FEIS. The FEIS may also be obtained at local libraries within the study area.
30	Request an opportunity to review and comment on the FEIS.	The FEIS was distributed to all who received or commented on the DEIS or the Draft Jurisdictional EPTR, to all those who registered at the public hearings, and to all those who requested the FEIS. Interested parties may submit comments to AFRCE-BMS/DEV, Norton AFB, CA 92409.
31	The Broken Plow Law Office wishes the Air Force to consider the comments of a number of organizations in a unified manner.	All comments have been considered both individually and collectively in the review and analysis of public comments.
32	The Cheyenne Board of Public Utilities should be given an opportunity to review and comment on the FEIS.	The FEIS was distributed to all who received or commented on the DEIS or the Draft Jurisdictional EPTR, to all those who registered at the public hearings,and to all those who requested the FEIS, including the Cheyenne Board of Public Utilities.
33	The DEIS does not present a complete picture of the impacts. It was necessary to refer to the EPTRs, and they were lacking data.	The FEIS has been completed to meet all requirements of NEPA. It is sufficiently detailed to provide an understanding of the significant environmental issues while not burdening the reader with all the backup material required for the analysis. Thirteen EPTRs have been published to provide additional detail to those who are interested. The EPTRs are available for review at the offices of city and county clerks and at public libraries in the deployment area. Copies of the EPTRs can be requested from the Air Force

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		at AFRCE-BMS/DEV, Norton AFB, CA 92409.
34	Impact summary graphics do not adequately describe specific impacts.	Summary graphics necessarily do not include specific impact information. These graphics were developed to provide only an overview of impacts. Detailed information on impacts can be found in both the FEIS and Final EPTRs.
35	The DEIS should consider all actions recommended by the Scowcroft Commission. Among these are super-hardening, Anti-Ballistic Missile and Ballistic Missile Defense.	This issue is addressed in Section 1.3.2 of the FEIS.
36	The methods of analyzing impacts and the criteria for determining level of impact and significance were arbitrary. The meaning of impacts should be described. The impacts are too generalized and understated.	The methods for analyzing impacts and the criteria for determining level of impact and significance were not arbitrary. The methods for analyzing impacts are fully described in the Draft and Final EPTRs. The level of impact definitions and significance criteria are defined for each resource in Sections 2.X.X.2 and 3.X.X.3 of the FEIS. These are based on scientific analysis and qualified professional judgment. Impacts are associated with one of four definitions for levels of impact and a determination is made as to whether or not it is significant. For the EIS, "impact" means a negative effect on the human or natural environment.
37	The impacts associated with nuclear war are not addressed in the DEIS.	This issue is addressed in Section 1.3.3 of the FEIS.
38	The DEIS should identify, describe, and evaluate monitoring and enforcing programs.	Both the DEIS and the FEIS identify, where appropriate, monitoring programs which should be considered. Suggested timing of these programs is also provided. Existing Air Force policies will be applied to ensure adequate enforcement of programs.
39	The DEIS should examine how Peacekeeper deployment will disturb the current nuclear balance between the two superpowers and create greater nuclear instability.	This issue is addressed in Section 1.3.4 of the FEIS.
40	The impact of living in fear of a nuclear war or accident should be addressed. Children are	This issue is addressed in Section 1.3.4 of the FEIS.

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	especially vulnerable to these psychological effects.	
41	The psychological impacts of living in regions surrounding a nuclear target are not discussed. The costs of training mental health workers and teachers to treat these anxieties are not addressed.	Please see Section 1.3.4 of the FEIS.
42	Alternative basing modes must be considered in the EIS.	This issue is addressed in Section 1.3.1 of the FEIS.
43	Cheyenne County, Nebraska should be included in the study area.	The area of study encompasses that area in which project effects of any magnitude, both direct and indirect, might be expected to occur. Direct impacts are those which are directly attributable to the project itself. Indirect impacts result from the induced population locating in a community related directly or indirectly to the Proposed Action. The study area is termed the Region of Influence in this document. Its size varies by resource and is defined at the beginning of each resource subsection. Data on existing conditions within the Region of Influence were collected. Cheyenne County, Nebraska is included in the Region of Influence for Energy, Recreation, Biological and Geological resources.
44	The DEIS is not written in laymen's terms and does not present a coherent description of project impacts.	The DEIS included an Executive Summary, which summarized key aspects of the project, including alternatives, general approaches to impact assessment, and a brief discussion of impacts generated by the project on 13 different human and natural resource elements. Subsequent chapters provide further detail for each subject. All of these were prepared with the lay reader and decisionmaker in mind.
45	The DEIS should address the impacts of the transportation and storage of Minuteman III missiles after replacement with Peacekeeper.	The FEIS discusses the transportation and storage of Minuteman III missiles. The transportation and storage of Minuteman III missiles and components have routinely been accomplished for nearly 20 years as an element of regular test and maintenance activities. For further information, please see Section 1.6.3.1 of the FEIS.

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46	Document is well written and clearly describes in layman's language the methods which were used to determine impacts.	Noted.
47	The DEIS was completed before all pertinent information concerning the project was developed and therefore all impacts could not be addresssed.	The pertinent information required to develop the DEIS was available in sufficient detail to evaluate significant impacts of the proposed action.
48	"Inasmuch as the DEIS was prepared before the Congress had fully authorized the Peacekeeper...it was very presumptuous for the writers...to use the verb 'will' rather than 'would' throughout the DEIS relative to effects of the Peacekeeper."	Noted.
49	Material in the DEIS is redundant in its references to staging areas throughout the document.	The DEIS analyzes thirteen separate resource areas. If an aspect of the project impacts several resources, it is discussed under each appropriate resource heading.
50	Mankind should be considered an endangered species.	Noted.
51	The list of attendees at the scoping meetings shown in the DEIS is not complete.	Persons attending the scoping meetings were requested to register. The DEIS reflects the names only of those persons who elected to register and for which there is a record of attendance.
52	The Air Force did not hire many local contractors or consultants to work on the EIS.	URS-Berger, the prime environmental contractor, is not headquartered in the deployment area. However, URS-Berger maintains an office in the deployment area. In addition, approximately 10 subcontractors/consultant firms from the deployment area participated in the development of the EIS.
53	The EIS should address the impacts in affected states and communities where major components of the Peacekeeper will be produced.	In light of the Jackson Amendment to the 1983 Department of Defense Appropriations Act, and the 1984 Department of Defense Authorization Act, which directed the Air Force to prepare an EIS on the deployment and peacetime operation of the Peacekeeper by January 31, 1984, the Air Force

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		has not included an analysis of production of major missile components in this EIS.
54	The DEIS is numbered in a cumbersome fashion. There is no index.	The numbering system used in the DEIS and the FEIS is a standard method. An index and a table of contents were provided in the DEIS.
55	The DEIS ignores a wealth of information and literature concerning nuclear weapons and their social and environmental aspects.	Noted.
56	The DEIS should address changes to the Launch Control Centers since these modifications could increase the chances of an accidental launch.	These changes will not increase the chances of accidents or accidental launches. Changes to the Minuteman command and control system are discussed in the EIS. For further information, please see Section 1.6.3.2 of the FEIS.
57	The severity of impacts to the environment are underrated because the scales against which they are evaluated are shifted to diminish impacts.	The level of impact definitions and significance criteria for each resource were derived based upon scientific methods and sound professional judgement. The definitions and criteria are appropriate for all types of projects and regions of the country. The definitions of impact levels and significance determinations were not shifted to reduce the proposed project's impacts.
58	The DEIS explicitly downplays dangers of the project such as accidents.	The DEIS did not downplay the potential of such events or the possible consequences. The FEIS contains a more detailed analysis and discussion in Section 1.6.10.4 of the FEIS.
59	The DEIS states there will be no unavoidable adverse impacts for utilities, transportation, land use and recreation. Will the Air Force therefore be committed to taking the mitigation measures necessary to avoid all impacts in these areas?	Unavoidable adverse impacts are those impacts which cannot be avoided or completely mitigated. Standard mitigation measures that could avoid, reduce, or eliminate environmental impacts that were assumed in the assessment process will be undertaken by the Air Force or its contractors. Additionally, mitigation measures which could be used to further reduce impacts are identified in the FEIS. Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts

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		caused by deployment and peacetime operation of the Peacekeeper system. This process may or may not result in avoidance of impact in these areas.
60	Methuselah lived 900 years, and even he wouldn't have time to read this.	Noted.
61	The DEIS fails to perform a residual analysis: the impacts that would occur if certain mitigating measures were implemented. Would such residual impacts be significant?	Standard practices that could avoid, reduce or eliminate environmental impacts were assumed in the environmental impact assessment process. In addition, mitigation measures which could be used to reduce impacts are identified in the FEIS. The FEIS discusses the reasonableness and effectiveness of these mitigation options. However, no aggregate residual analysis was performed on any particular combination of mitigation measures.
62	The EIS should address the effects of Peacekeeper-related atomic explosions at the Nevada Test Site on the environment and health of nearby and downwind residents.	The assessment of impacts of testing specific nuclear weapons systems is completed by the Department of Energy, and is not considered in this EIS on the deployment and peacetime operation of the Peacekeeper missile. Atmospheric testing of nuclear weapons was banned worldwide by test ban treaties.
63	Was controversiality considered in determining significance of impacts?	In some resource modules "controversy" was considered to be one of multiple criteria used to determine significance. The narrative of each environmental resource discusses the extent to which controversy contributed to the overall significance determination.
64	The DEIS description of existing environmental conditions and discussion of impacts is too general. The impact information should be more specific, be described in more detailed text and should make better use of maps and quantification. The logic behind determination of significance should be included.	The FEIS has been prepared to meet all requirements of NEPA. It is sufficiently detailed to provide an understanding of the significant environmental issues while not burdening the reader with all the backup material required for the analysis. Thirteen EPTRs have been published to provide additional detail to those who are interested. The EPTRs are available for review at the offices of city and county clerks and at public libraries in the deployment area. Copies of the EPTRs can be requested from the Air Force

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		at AFRCE-BMS/DEV, Norton AFB, CA 92409.
65	Impacts are presented separately by resource and alternative. Given the size and complexity of the document, it is nearly impossible for readers to aggregate these impacts. The aggregation of impacts presented by resource in Section 3.0 is useless in comparing alternatives. CEQ regulations require the proponent to clearly present the results of analyses aggregating impacts and comparing alternatives.	The method of reporting and summarizing impacts was selected to balance the informational requirements of the decisionmaker, lay readers, and specialists in technical fields.
66	The Draft Jurisdictional EPTR underestimates the impacts on Pine Bluffs, Burns, and Albin.	The impacts on Pine Bluffs, Burns, and Albin as generated by population and such non-population factors as road construction and traffic have been reevaluated. For further information, please see Sections 3.1.1.4 and 3.1.9.4 of the FEIS and Sections 3.5, 3.6, and 3.7 of the Final Jurisdictional EPTR.
67	The Draft Jurisdictional EPTR ignores "lost opportunity costs, and has not considered the utilization of excess capacity".	As set forth in the Memorandum of Agreement in Appendix J of the Final Jurisdictional EPTR, the Final Jurisdictional EPTR is not required to provide fiscal analysis. This is provided by the Fiscal Impact Analysis conducted by the Department of Defense, Office of Economic Adjustment.
68	Exception is taken to the Draft Jurisdictional EPTR conclusion that there will be no significant adverse effects from the project. The general tenor of the report is to understate all potential impacts.	The Draft Jurisdictional EPTR identified adverse impacts. Every effort has been made to accurately assess impacts caused by the project.
69	The Draft Jurisdictional EPTR is superficial and finds no impacts even in contradiction of its own observations. Presentation of the raw data is needed to determine if the study was fair or accurate.	Every effort was made to provide analyses as complete and accurate as possible. The Final Jurisdictional EPTR contains summaries of data and methodologies used. More complete discussions of analyses and impacts can be found in the various Final Resource EPTRs.
70	The Draft Jurisdictional EPTR was slanted and biased in favor of persuading Nebraskans that the impact of the project will be largely beneficial.	Every effort was made to completely and accurately analyze impacts.
71	Chapter 6 of the Draft Jurisdictional EPTR was superficial and inconsistent in its depth and	Every effort was made to provide complete and accurate analyses in the Draft Jurisdictional

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	coverage. The information on Albany County should be complete and accurate in order to properly access impacts.	EPTR. Subsequent reanalysis has shown that no population inmigration will occur in Albany County and extensive treatment of Albany County is not provided in the Final Jurisdictional EPTR.
72	The Draft Jurisdictional EPTR lacks cohesion because it is organized section by section and cross-section references are not included.	The Draft Jurisdictional EPTR was organized to allow a county-by-county discussion of services and facilities. The DEIS and FEIS are organized by resource.
73	The Draft Jurisdictional EPTR is so superficial as to be useless, and no further deployment activities should go forward until a complete socioeconomic impact study is prepared. A complete study would address fiscal questions.	The Draft and Final Jurisdictional EPTRs meet the requirements of the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska (found in Appendix J of that EPTR). A Fiscal Impact Analysis is being provided separately by the Department of Defense, Office of Economic Adjustment.
74	Scotts Bluff County, Nebraska should be included in the study area. The DEIS does not adequately address the impacts to the Scottsbluff/Gering community.	Scotts Bluff County was included in the Region of Influence developed for each resource in the EIS process. The Region of Influence encompasses the areas where impacts, both direct and indirect, might be expected to occur. Direct impacts are those which are directly attributable to the project itself. Indirect impacts are those which result from induced population as a result of the project. Following data collection on existing conditions in these areas, a preliminary analysis was conducted to determine which area or areas within each resource's Region of Influence would experience potentially important impacts. These were identified as areas of concentrated study. All or portions of Scotts Bluff County were included in the area of concentrated study for twelve resources.
75	The EIS must include information which is not supportive of Air Force findings.	The Air Force has made every attempt to complete a fair and unbiased analysis of impacts. In considering specific impacts, a range of scientific information, agency concerns, and public comment was considered.
76	NEPA regulations state that an EIS should be a decision document. The EIS does not analyze	This issue is addressed in Section 1.3.1 of the FEIS.

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	alternatives to the proposed action as required by NEPA and CEQ regulation or the No Action Alternative.	
77	The DEIS does nc adequately disclose impacts.	The Air Force has complete an FEIS that meets all requirements of NEPA. It is sufficiently detailed to provide an understanding of the significant environmental issues while not burdening the reader with all the backup material required for the analysis. A series of 13 EPTRs has been published to provide additional detail to those who are interested. The EPTRs are available for review at the offices of city and county clerks and at public libraries in the deployment area. Copies of the EPTRs can be requested from the Air Force at AFRCE-BMS/DEV, Norton AFB, CA 92409.
78	The EIS should consider the deferred action alternative.	The Air Force has not included a "deferred action alternative" because a thorough inquiry into the proposed action and the area it affects has allowed the Air Force to make an informed prediction about the environmental effects of the proposed action and alternatives. In this case there are no important gaps in information or scientific uncertainties that are relevant to the decisionmaking that the document is designed to support.
79	The EIS should cite criteria used for exempting the Peacekeeper EIS from NEPA requirements, and should identify the potential impacts of future programs and policies that may be granted similar NEPA exceptions. The implications of the Jackson amendment on future U.S. environmental policy and programs should be addressed in the EIS.	The Air Force has completed an FEIS that meets all requirements of NEPA. It is sufficiently detailed to provide an understanding of the significant environmental issues while not burdening the reader with all the backup material required for the analysis. In addition, it was designed to provide decisionmakers information required for making decisions. In this regard, the Jackson Amendment and DoD Authorization Act, 1984, mean that the EIS should analyze the impact of deploying and operating 100 Peacekeeper missiles in existing silos at F.E. Warren AFB rather than examining alternative basing modes or sites. The Jackson Amendment is project-specific and was not intended to affect future U.S. environmental policy or programs.
80	The preparation of a detailed environmental study along political rather than logical environmental	Boundaries for detailed environmental study were defined in a two-step process. The first

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	boundaries is not consistent with the intent of NEPA or the CEQ regulations.	identified the Region of Influence and the second identified the Areas of Concentrated Study. This definition was accomplished through an analysis of human and natural resources and not on the basis of political boundaries. Both Regions of Influence and Areas of Concentrated Study were defined for each of 12 environmental resource areas analyzed in the EIS. Criteria for definition of these boundaries for each resource are described in Sections 3.X.X.1 of the FEIS.
81	The DEIS is grossly inadequate as a decision-making tool because it does not consider impacts on Colorado even though Regions of Influence extended far into Colorado. The Air Force has not fulfilled its responsibilites under NEPA.	The Air Force has completed an FEIS that meets all requirements of NEPA. The Region of Influence for each environmental resource was determined through an analytic process not on the basis of political boundaries. In fact, a majority of the Regions of Influence include portions of Colorado, and the regional impacts that were discovered in Colorado were given the same consideration as regional impacts located in other states. The Areas of Concentrated Study, where most impacts are located, are typically in the immediate vicinity of silos and the support base and therefore do not extend any significant distance into Colorado.
82	Money spent on the study wasn't necessary if the area of "deployment" had already been decided. Were we given a full account of water, road and "site" usage?	A Memorandum of Agreement among the states of Wyoming and Nebraska and the Department of Defense required the study to assess impacts and suggest possible mitigations. Descriptions of water, road, and site usage are in the FEIS and Final Jurisdictional EPTR.
83	The City of Gering lacked opportunity to provide input to the Air Force and the Peacekeeper Working Group throughout the process.	Officials of the City of Gering were contacted during preparation of the Draft Jurisdictional EPTR. In addition, a meeting was held in Gering on November 8, 1983, for the purpose of obtaining further comments on the Draft Jurisdictional EPTR.
84	Statement objecting to private meeting held in Lincoln between the Air Force and government officials. The meeting should be public.	This technical working meeting was held between local government officials and Air Force representatives. It was open to the public. The purpose of the meeting was to receive feedback from state government representatives on the Draft Jurisdictional EPTR. Similar meetings were held in Scotts Bluff County, Banner County, and Kimball

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		County in Nebraska and in Laramie County, Platte County and Goshen County in Wyoming.
85	The Air Force held meetings with Scottsbluff officials which were not advertised.	While it was not advertised, it was open to the public. This technical working meeting was held between local government officials and Air Force representatives. The purpose of the meeting was to receive feedback from state government representatives on the Draft Jurisdictional EPTR. Similar meetings were held in Lincoln, Banner County, and Kimball County in Nebraska and in Laramie County, Platte County and Goshen County in Wyoming.
86	A coordinating council should be formed to monitor and update all information supplied for the Peacekeeper project, and funding for this mitigation must be provided by the federal government.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
87	Adequate financial assistance to mitigate the impact of the project must be provided by the Air Force.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
88	The Air Force must assist with the expedient resolution of unforeseen problems related to the boom/bust cycle that arises during and after deployment, for which mitigation measures are not planned. The Air Force should establish a mitigation fund to meet these needs, as well as a monitoring program to ensure that adequate mitigation dollars are available when needed in a timely manner.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
89	Mitigation planning and mitigating funds must be sufficient, undertaken rapidly, and received in a timely manner.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing

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		detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
90	In the FEIS, the Air Force should cite specific mitigation measures and make a commitment to implement them.	Standard mitigation measures that could avoid, reduce or eliminate environmental impacts that were assumed in the assessment process will be undertaken by the Air Force or its contractors. Additionally, mitigation measures which could be used to further reduce impacts are identified in the FEIS. Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and indentifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system. This process may or may not result in avoidance of impact in these areas.
91	All mitigations assumed in the DEIS must be approved by the appropriate regulatory authority prior to construction.	The Air Force will comply with applicable requirements of regulatory agencies with jurisdiction over elements of the proposed action.
92	The state and local government should not incur a disproportionate percentage of the financial obligations of a national project such as Peacekeeper deployment.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts generated by deployment and peacetime operation of the Peacekeeper system.
93	Projects necessitated by the Peacekeeper missile would not be eligible for state grant assistance. Mitigation funds will have to come from sources other than coal tax and mineral royalty grants.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
94	Because of the size of the project, requests for mitigation should be broadened to include all	The Air Force has identified mitigation measures to respond to virtually every category of

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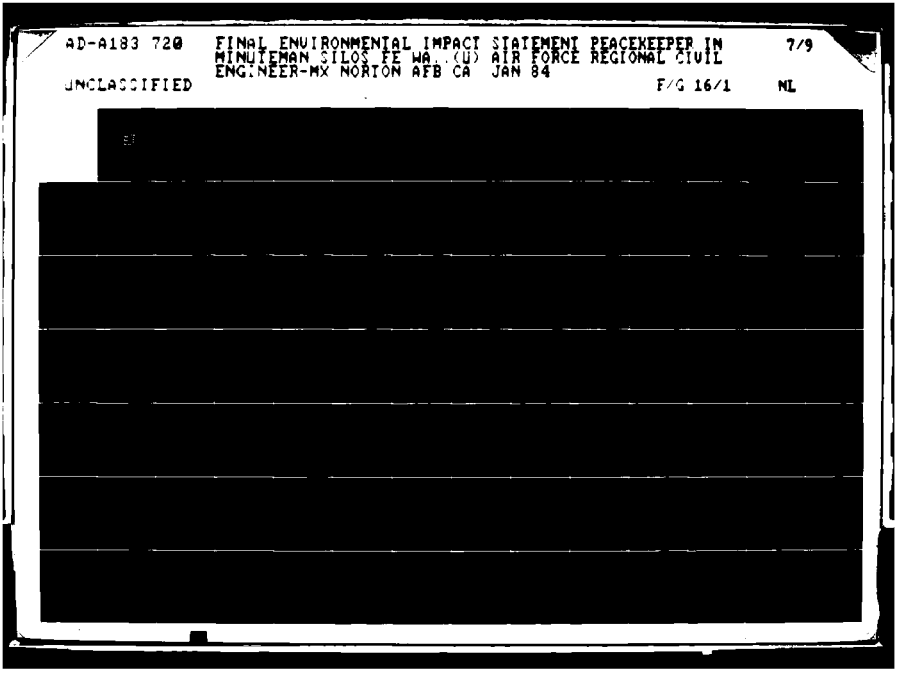
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	categories of potential environmental impacts addressed in the DEIS.	impacts addressed in the FEIS. The FEIS acknowledges that unavoidable adverse impacts may occur in some areas.
95	Mitigation measures must include preparing local decisionmakers to make effective decisions in rapid growth situations.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group will develop detailed mitigation plans and programs, recommend funding sources and levels and identify mechanisms for minimizing impacts generated by deployment and peacetime operation of the Peacekeeper system. Educational programs for decision makers should be considered through this mitigation working group.
96	The Final Jurisdictional EPTR should present local government officials with policy options and alternatives, and seminars outlining policy options and the effects of these options should be held.	This mitigation is presented in Section 1.0 of the Final Jurisdictional EPTR.
97	The Draft Jurisdictional EPTR provides little or no guidance for the community as to how legitimate mitigation measures should be secured and financed.	Under the Memorandum of Agreement among the Secretary of Defense and governors of Wyoming and Nebraska, a working group will develop detailed mitigation plans and programs, recommending funding sources and levels and identifying mechanisms for minimizing impacts generated by deployment and peacetime operation of the Peacekeeper system.
98	The mitigation measures may need to be implemented on a much more rapid scale than the Draft Jurisdictional EPTR suggests.	The actual timing of specific mitigations will be determined once the final mitigation plan is adopted by the state and local governments.
99	The mitigative measures are too general and fall short of what is necessary; they must be more specific and innovative.	The mitigation measures have all been reevaluated and more specific mitigations have been included. For the specific mitigations identified, please see the last section for each resource in every jurisdiction of the Final Jurisdictional EPTR.
100	The assumptions used in the Draft Jurisdictional EPTR should be presented, including source of data used, location of bases from which data were gathered, and timeframe of the study. Lines of reasoning are also unclear.	Methodologies used and sources of data are described fully in the Resource EPTRs and summarized in the Final Jurisdictional EPTR. Lines of reasoning have been reexamined for clarity.

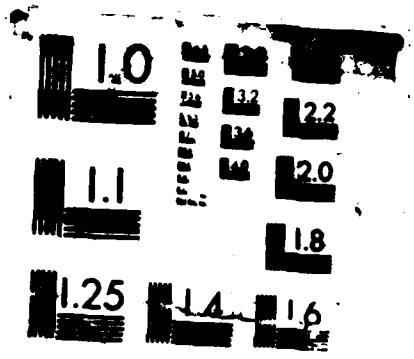
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101	The Executive Summary does not adequately address many areas of impact, especially impacts to farms and ranches.	The purpose of the Executive Summary is to provide a very short overview of impacts. More specific information can be found in the FEIS and the EPTRs. The discussion of potential impacts to farm and ranch operators has been expanded subsequent to the DEIS.
102	The Air Force is willing to use the existing services and facilities, but they are not willing to help address existing shortfalls.	The purpose to the EIS and Jurisdictional EPTR is to identify impacts associated with the project. Although existing shortfalls are addressed in order to evaluate the capacity of existing service delivery systems without the project, only impact shortfalls are minimized or avoided through mitigation.

AD-A183 720 FINAL ENVIRONMENTAL IMPACT STATEMENT PEACEKEEPER IN MINUTEMAN SILOS FE WA.. (U) AIR FORCE REGIONAL CIVIL ENGINEER-MX NORTON AFB CA JAN 84 7/9

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MICROCOPY RESOLUTION TEST CHART

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103	The Peacekeeper in Minuteman Silos program is supported.	Noted.
104	Opposition to the development of the Peacekeeper Missile System in Minuteman Silos for reasons of disagreement with national defense policy, concern regarding potential project impacts of nuclear war, objections to the term "Peacekeeper" and moral disagreement with nuclear policy, first-strike capability and deterrence.	Noted.
105	The Air Force's personnel reliability program should be improved to ensure responsibility and character of missile personnel.	The Air Force's Personnel Reliability Program is rigorous, and is constantly being improved and updated.
106	Should there be a nuclear attack on the U.S., would the presence of full-scale Peacekeeper production facilities and additional Minuteman spares affect Utah's status as a high risk area?	It is difficult to determine the nuclear strike plans of other nations. However, it is likely that all major weapons systems production facilities in the U.S. have been considered as targets for attack.
107	What are the total nationwide cost implications of the Peacekeeper system? The Air Force should consider the effects of system expansion, the addition of protective systems, and national debt aspects of Peacekeeper funding.	No improvements or modifications are now planned over the 20 to 30-year life of the Peacekeeper system. The cost of the system deployment will be $16.6 billion, as measured in 1982 dollars. The allocation of funds among federal agencies and the resulting national implications are the prerogative of the U.S. Congress and are not considered in the FEIS. For further information, please see Section 1.3.2 of the FEIS.
108	The need for the Peacekeeper system may differ from that underlying the M-X Milestone I and II documents. In view of new government strategic studies and the Scowcroft Commission Report, the EIS should address the rationale for proceeding with Peacekeeper production and deployment.	This issue is addressed in Section 1.2 and 1.3 of the FEIS.
109	The DEIS should consider the impacts of reduced tourism and businesses being deterred from locating in the region because it will become a nuclear target.	Neither the DEIS nor the FEIS addresses this concern. While it is impossible to predict the targets an adversary might attack, it is reasonable to assume that because of Minuteman silos and other transportation, scientific and industrial facilities, the region is already a

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		target for nuclear attack. Thus, it would be a fruitless and speculative exercise to try to analyze what are truly unforeseeable indirect impacts of the Peacekeeper deployment to businesses and tourism in the region.
110	Extensive coordination for Civil Defense among all concerned federal, state, and local agencies is needed.	Civil Defense planning is the responsibility of the Federal Emergency Management Agency (FEMA). The Air Force participates in these planning activities. For further information, please contact FEMA, 500 C Street SW, Washington, DC 20472.
111	Why is a land-based missile preferred over submarine-based missiles?	The land-based ICBM force is characterized by excellent command, control, and communication and the flexibility to be retargeted rapidly to respond to changing demands of crisis or conflict. The land-based ICBM has the best prompt counter-military capability of any TRIAD element; a combination of quick reaction, high accuracy, and yield.
112	Does the Scowcroft commission report contradict itself by recommending deployment of the Peacekeeper as well as small single-warhead systems?	No. After an in-depth review of the missile and basing alternatives currently available, the commission concluded, and the President agreed, that a phased approach is in order. In the near term, 100 Peacekeeper missiles will be deployed in existing silos to counteract the reduced capability of our aging ICBM force, and technology will be developed, such as a small missile, to identify long-term survivable basing alternatives. It is important to note that these two aspects of ICBM modernization are integrally related. They point toward the same objectives to move toward more stable ICBM deployments over time in a way that is consistent with arms reduction agreements having the objective of reducing the risk of war. Neither part of the program can accomplish this by itself.
113	Insurance companies will not cover any damages done by the Air Force or the missiles to private property.	Regardless of the coverage offered by particular insurance companies, under the law the Air Force is liable for its actions that cause damage to private property.
114	How will landowners be compensated for cable easement acquisition and loss or damage suffered	The owner of the land crossed by cable routes will be compensated for easements required to install

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	during cable emplacement?	and maintain the cable system. In addition, the U.S. government or its contractors will pay for any crops that are destroyed, or any other damages that result from cable installation and maintenance activities. For further information, please see Section 3.2.1.1.2 of the Final Land Use EPTR.
115	The Air Force should be responsible for personal injury or property damage that may occur during construction of the missile or cable installation.	The Air Force or its contractors will be responsible for injury and damage that may occur.
116	The Peacekeeper missile system is not a defensive weapon. It is a first-strike weapon.	The U.S. government does not have a first-strike policy. Furthermore, 100 missiles is not a sufficient number to constitute a first-strike force.
117	Peacekeeper funding is depriving benefits to other people, and diverting tax dollars to defense spending.	The allocation of funds among federal agencies and the resulting national implications are the prerogative of the U.S. Congress and are not considered in the EIS.
118	Funding for only 21 missiles has been appropriated. The rest have not been funded and may not be funded due to a change in national leadership. The EIS should consider the impacts of further funding being denied or delayed before or during construction.	The President has decided and Congress has approved the decision to deploy one hundred Peacekeeper missiles in Minuteman silos. Therefore, the Air Force has chosen not to speculate about future funding in the EIS.
119	Is the deployment of Ballistic Missile Defense systems absolutely precluded by the Scowcroft Commission report? If not, wouldn't deployment in Nebraska and Wyoming be under the Command of F.E. Warren AFB?	No, their deployment is not absolutely precluded. For further information, please see Section 1.3.2 of the FEIS.
120	Will the Midgetman missile system be developed? What impacts will Nebraska and Wyoming face from Midgetman deployment?	This issue is addressed in Section 1.3.2 of the FEIS.
121	The Air Force is trying to divert attention from the real issue of the impact of Peacekeeper and small ICBM on the continued integrity of national security to the work done on fairly insignificant environmental impacts.	The purpose of the Environmental Impact Statement is to examine the environmental impacts of deployment and peacetime operation of one hundred Peacekeeper missiles in Minuteman silos as directed by the President and Congress of the United States.

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122	The Peacekeeper is based in vulnerable silos. It will therefore not survive an attack and could induce a nuclear strike.	The Peacekeeper in existing silos will resolve the two key issues of aging and decreasing counter-military capability of our land-based ICBM force. Since there is no near term confident solution to the ICBM survivability problem, longer term technology development programs can be initiated as a basis for resolving this issue. In fact, as has been noted by the President's commission, the vulnerability of existing silos in the near term, viewed in isolation, is not a sufficiently dominant part of the overall problem to warrant other steps being taken at this time. Additionally, Peacekeeper deployment will demonstrate our national resolve and provide arms control leverage.
123	The Air Force should increase the time allotted for the research and review of project impacts before making decisions.	The DEIS and FEIS meet the requirements of NEPA. Additionally, the Air Force is required by Congress to publish the FEIS by 31 January 1984 and the schedule for EIS research and review was developed with this deadline as a milestone.
124	Commenter has developed a shuttle concept for deployment of Peacekeeper at a significant cost saving over the former shuttle concept.	The President has directed that the recommendation of the Scowcroft Commission to replace 100 Minuteman III missiles with 100 Peacekeeper missiles in fixed silos be implemented.
125	Define the purpose of the Peacekeeper in current arms control negotiations and its use as a bargaining chip.	The Peacekeeper forms an important part of the Scowcroft Commission's plan, endorsed by the President and the Congress to enhance deterrence and security by modernizing the ICBM force. The Peacekeeper plays an important part in the negotiations in Geneva. As the commission noted, the Peacekeeper program provides significant negotiating leverage at the START talks; it provides an incentive to negotiate seriously on the reductions the President has proposed.
126	The Air Force should provide a community liaison officer in Torrington.	The Air Force has a liason office in Cheyenne which can be reached at (307) 772-2828. The Air Force is investigating the feasibility of establishing temporary office hours in other locations in the deployment area.
127	The North Platte Natural Resources District would like to continue communications with the Air	Noted.

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	Force during the construction phase. The District is willing to cooperate with Air Force conservation activities during construction.	
128	What will be the work activities of the 600 additional people who remain employed after the construction period?	As shown in Section 3.1.1.4 of both the DEIS and the FEIS, there are a total of 590 new jobs created by the project after 1990. Of these, 360 jobs are military positions, and 115 jobs are civilian positions, and all are for operations and maintenance of the Peacekeeper system. A total of 115 jobs are non-project (indirect) positions created by the expenditures of the additional project employees. All of these jobs are in addition to the existing Minuteman staff.
129	Will power lines be raised to accommodate transporter emplacer vehicles?	The transporter running height is about 14 feet 8 inches, which is about a foot higher than a normal semitrailer. It is not likely that power lines will require raising. The responsible electric utilities will be contacted by the Air Force to raise those lines determined to have inadequate clearance and to notify the affected users if service is to be interrupted.
130	Concern about the accommodation of transporter vehicles within the existing boundaries of the launch facilities.	The existing boundaries of the launch facilities are sufficient to accommodate transporter/emplacer vehicle.
131	Blast and fallout shelter space should be included at any new buildings on F.E. Warren AFB.	There is an existing program to provide blast and fallout shelter space on F.E. Warren AFB.
132	Is the concrete in silos structurally adequate to withstand placement of new missiles without additional concrete work?	Yes. The deployment of the Peacekeeper system does not require any modifications to the concrete portion of the underground silos.
133	Leakage of radioactive material from the missile could contaminate ground and surface water sources in the deployment area.	The Peacekeeper missile system is designed to preclude leakage of radioactive material. For further information, please see Section 1.6.10.6 and Section 1.6.10.8 of the FEIS.
134	The concrete silos will crack due to soil expansion.	The design of structures has taken into account all loads, including those imposed by expanding soils.
135	Specific evacuation plans for missile silo areas should be developed and identified.	This issue is addressed in Sections 1.6.10.4 and 1.6.10.8 of the FEIS.

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136	Landowners along cable routes should be notified well in advance of construction of cables.	Landowners will be notified a reasonable time in advance of construction activities and will be informed of the schedule for cable construction.
137	What will the impacts be to existing dwellings near proposed or alternative cable routes?	No existing dwellings will be affected by any of the possible routes.
138	Due to variables in funding and permitting processes, how can the initial operating capability of 1986 be met?	All funding and regulatory plans are anticipated to be completed so that the initial operating capability can be achieved.
139	In the past, military personnel on exercises have interfered with the safe use of public roads. Air Force activity near silos should be monitored to ensure public safety.	The training exercises for Peacekeeper will be identical to those presently used for Minuteman. The Air Force is also in the process of reviewing the training procedures to minimize interference with ongoing public uses.
140	The rights of private property owners must be honored; others should be considerate of private lands and facilities.	The Air Force intends to honor the rights of property owners. To satisfy this intent, extensive orientation programs are conducted at F.E. Warren AFB. Air Force contractors will be instructed to hold similar orientation programs. Appropriate action will be taken against those who violate Air Force guidelines. Any problems should be reported to either the Wing Commander or the SATAF Commander at F.E. Warren AFB.
141	Impacts to local residents' road usage during deployment, operations, and maintenance should be clearly described and addressed.	Analysis of these impacts has been addressed in the FEIS. For further information, please see Section 3.1.9.4.1.2 of the FEIS and Section 3.5.1.2.2 of the Final Transportation EPTR.
142	Missile maintenance can be more safely performed during hours of daylight than darkness.	Air Force missile maintenance procedures are conducted in a safe manner regardless of the time of day. To the maximum extent practicable, scheduled maintenance operations will occur during daylight hours. However, emergency maintenance may be undertaken at any time of day.
143	The EIS should describe in detail what increased security measures will be and how they will affect the rights and lifestyles of local residents.	This issue is addressed in Sections 1.6.3.1 and 1.6.10.5 of the FEIS.
144	Security measures should be increased for Peacekeeper compared with Minuteman III. Terrorist	The security system used to protect the Peacekeeper system will be virtually identical to that

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	attack is a possibility.	now used for the Minuteman III System. The security system is capable of detecting and dealing with unauthorized access or intrusion in the Peacekeeper system. For further information, please see Sections 1.6.10.4 and 1.6.10.5 of the FEIS.
145	Will roads be closed off to regular traffic when installing and rerouting the missiles?	There will be no blocking of the roads in addition to that which now occurs. Traffic will be stopped and intersections briefly closed while convoys escort some elements of the system.
146	How will the remaining 123 missiles be used once the first 100 have been deployed?	The 123 missiles will be used for a testing program at Vandenberg AFB, for spare parts in the event that a particular missile has operational deficiencies, and for monitoring of aging effects.
147	How many workers are expected at one time at a Launch Facility site, and how many Launch Facility sites would be under modification at one time?	A maximum of 30 workers are expected at one time on the Launch Facility site. Current estimates are that a maximum of 10 Launch Facility sites will be under modification at one time. For further information, please see Section 1.6.3.1 of the FEIS.
148	What additional housing and shopping facilities will be provided at F.E. Warren AFB for incoming families? Any construction should be phased so as to minimize construction and housing impacts on the community.	No additional housing or shopping facilities are associated with deployment of the Peacekeeper missile. Under previously programmed activities, the Air Force plans to replace some onbase housing and shopping facilities. These activities are not directly associated with the Peacekeeper project. The Air Force will continue to rely on offbase housing and shopping facilities to augment that which is provided onbase.
149	Road and construction contracts should be small enough to allow local contractors to compete successfully.	The Air Force is currently attempting to involve more local contractors in the competitive bidding process. Among other efforts, the Air Force will attempt to issue requests for proposals in sizes that would encourage local contractor participation. This concern has been relayed to the state highway departments that will be responsible for most road construction.
150	The EIS does not consider impacts or mitigations due to compressing or delaying the construction	The Air Force analyzed the proposed action and reasonable alternatives, including the No Action

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	schedule.	alternative, and chose not to analyze the full range of contingencies that may or may not occur. Should significant changes in the Peacekeeper construction program be made, the Air Force will consider the need for additional environmental analysis at that time.
151	The Air Force should make a commitment to hiring local residents for the project whenever possible.	Air Force contractors will be responsible for all hiring. Efforts are being made to maximize local labor participation. For example, hiring hall arrangements with local labor unions are planned. For further information, please see Section 3.1.1.6 of the FEIS and Section 3.5.1.2 of the Final Socioeconomics EPTR.
152	It is unfortunate that a ten-year project was compressed to a three-year term. Would like construction period to be extended to 20 years.	The initial and final operating capability was established by the President and endorsed by Congress. The Air Force plans to meet this schedule.
153	Impacts of malfunctions of the Peacekeeper missile during use should be addressed.	This EIS considers the deployment and peacetime operation of the Peacekeeper missile at F.E. Warren AFB, WY. Possible malfunctions that might occur during peacetime operation of the system are addressed in Section 1.6.10 of the FEIS.
154	What abnormal conditions (accident, earthquake, terrorist attack) could cause an explosion in a silo during deployment of the missile? What would the impacts of such an accident be? Can the Air Force guarantee that such impacts would be contained?	The Air Force has analyzed system safety issues pursuant to the requirements of the CEQ regulations. For further information, please see Section 1.6.10 of the FEIS.
155	The EIS should identify safety plans, measures, and educational programs for protection of rural residents, to be implemented in case of accidents during missile deployment.	The FEIS identifies safety plans, contingency responses and other programs to protect public health. For further information, please see Sections 1.6.10.5 and 1.6.10.8 of the FEIS.
156	Since no EIS was prepared for the existing missile deployment, this EIS should assess the impacts for the entire 90th Strategic Missile Wing deployment area, including the full range of public health and safety-related considerations.	The scope of this EIS is designed to respond to Congressional direction to evaluate the deployment and peacetime operation of 100 Peacekeeper missiles at F.E. Warren AFB. The impact of the operation of the Minuteman III missiles that will remain after Peacekeeper is deployed has not been considered. However, the analysis is not limited

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		to those areas physically within the missile flights that will be replaced. Rather, the impact of the Peacekeeper on the entire region has been treated. Public health and safety issues are addressed in the FEIS. For further information, please see Section 1.6.10 of the FEIS.
157	The Air Force should ensure that contingency planning and advance coordination occurs among all agencies that should be involved in emergency situations requiring hazardous material control and cleanup.	Contingency planning among all agencies that should respond to emergency situations involving hazardous materials is important and has already begun.
158	The medical community should be informed about potential injuries or accidents that could occur during deployment and operation, in order to be prepared for dealing with emergencies.	The Strategic Air Command at F.E. Warren AFB provides disaster preparedness planning and procedures for response to a mishap. The base has mutual aid agreements with the local Cheyenne medical community to handle overflow base medical needs. This agreement serves as a foundation for necessary interaction for identifying common emergency medical needs.
159	A discussion of possible accidents in the missile storage area should be addressed in the EIS.	The Air Force has analyzed system safety issues pursuant to the requirements of the CEQ regulations. For further information, please see Section 1.6.10.4 of the FEIS.
160	The disaster and civil defense training available to civilians is not carried out in an adequate or serious manner.	As set forth in Section 1.6.10 of the FEIS, the Air Force has designed and intends to operate the Peacekeeper System to reduce any risks to public health and safety. Contingency responses to be carried out by Air Force personnel have also been specified. Civilian disaster and civil defense training is not required as an element of Peacekeeper deployment, it is the responsibility of the Federal Emergency Management Agency, 500 C Street S.W., Washington, DC 20472.
161	The stated historical safety record provides neither sufficient or applicable information when the significant differences between the Peacekeeper and Minuteman systems are considered. The DEIS does not include an extensive safety analysis for the missile components, special handling equipment and facilities, and its	This issue is addressed in Section 1.6.10 of the FEIS.

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	transportation. An industrial hazard control assessment should be written for the FEIS concerning each major component of the missile system.	
162	Air containing hydrogen gas (from battery charging) should not be recirculated as stated in the DEIS. The FEIS should provide the number of air changes required in the system to prevent explosive atmosphere from occurring.	This issue is addressed in Section 1.6.10.4 of the FEIS.
163	The worst-case scenario for accidents with the Peacekeeper missile should be identified and addressed in the EIS.	The worst-case scenario is a simultaneous explosion and burning of all four stages. For further information, please see Section 1.6.10.4 of the FEIS.
164	The probability of accidental detonation or launch should be carefully scrutinized. Such accidents have occurred in the past.	This issue is addressed in Sections 1.6.10.2 and 1.6.10.4 of the FEIS.
165	Hazards involved in the staging process should be identified. Are there any local regulations that would preclude this activity?	The hazards involved in assembling the missile components are essentially the same as these for transporting and storing missiles: shock, puncture and heat. Air Force missile assembly activities are not subject to local regulation. For further information, please see Section 1.6.10.4 of the FEIS.
166	The EIS should identify all routes and procedures for transporting warheads and other hazardous materials. Resulting impacts and safety measures to be implemented should also be discussed.	The routes and procedures for transporting the missile within the deployment area are described in the FEIS. Nuclear and hazardous materials will be handled in compliance with applicable federal and state laws. Based on improvements made in the Peacekeeper system, safety measures in addition to a discussion of potential storage, transportation or in-silo accidents are discussed in the FEIS. Plans for responding to such accidents are also discussed. For further information, please see Section 1.6.10 of the FEIS.
167	How many transportation accidents involving assembled missiles have occured in the past?	Only five transportation accidents involving an assembled Minuteman missile have occurred over the past 19 years. For further information, please see Section 1.6.10.4 of the FEIS.
168	The DEIS does not consider the very serious consequences of the accidental dispersal of	The possibility that nuclear material would be released is extremely remote. During peacetime

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	plutonium and other toxic substances from the propellants. Can they leak and contaminate groundwater? What are their effects on agriculture and livestock, as well as on animals and human beings? Specific cleanup and decontamination activities should be described.	operation of the Peacekeeper system, the population would not be exposed to radiation or other hazards. In case of a mishap, the Air Force would immediately take steps to limit exposure to humans and animals and to protect natural resources. For further information, please see Section 1.6.10 of the FEIS.
169	Permits will be required if the wastewater pond at F.E. Warren AFB is to be used for storing or treating liquid waste from the missile system or other waste products.	The Air Force will comply with all applicable regulations and procedures for the safe storage and disposal of all waste materials.
170	A Bioenvironmental Engineer should be assigned to directly monitor the discharge of hazardous substances during construction on a daily basis.	A Bioenvironmental Engineer will not be assigned on a daily basis. However, Air Force contractors will be required to comply with federal, state, and local environmental quality requirements. A Bioenvironmental Engineering staff is assigned to F.E. Warren AFB and could be used in emergencies. Construction inspectors will monitor contractor compliance with applicable environmental quality requirements.
171	What is the probability, from the fault tree analysis, of ignitions, penetrations and leakages as cited in the DEIS, page 1-31?	Fault tree analysis has not identified probabilities associated with the accident scenarios postulated in the text of the DEIS. Fault tree analyses were employed in the development of design criteria for the Peacekeeper system. Design criteria are addressed in Section 1.6.10.2 of the FEIS.
172	In a maximum credible accident scenario, what are the projected inhalation and ingestion plutonium concentrations, and committed dose due to plutonium in lungs and in bones, at which the Air Force would commence protective actions to limit or avoid those projected doses?	The probability of aerosolization of nuclear materials are very remote, and therefore the possibility of inhalation and ingestion of nuclear materials are also very remote. This issue is addressed in Section 1.6.10 of the FEIS.
173	Statement expressing interest in hazardous wastes, further discussion is required in the EIS.	Further review indicates that the discussion of hazardous wastes as presented in the DEIS and FEIS meets the requirements of NEPA. For further information, please see Section 1.6.10 of the FEIS.
174	The Air Force should not install missiles in an active fault zone. What would be the consequences	This issue is addressed in Section 1.6.10.4 of the FEIS.

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	of an explosion resulting from an earthquake?	
175	Who should be contacted for removal of trash around silos?	Air Force maintenance and operation crews are required to remove their own trash. If problems should occur, please contact the Wing Commander or the SATAF Commander at F.E. Warren AFB.
176	The Draft Jurisdictional EPTR fails to provide any planning or analysis regarding the possibility of accidents involving explosions combined with the release of radioactive materials at the silos or during transportation.	Please see Section 1.6.10 of the FEIS.
177	The effects of the project on future generations of school children must be evaulated, in light of evidence of lower SAT scores being linked with atmospheric nuclear testing. The potential for radiation leaks or nuclear accidents should be included in the Socioeconomic analysis.	Please see Section 1.6.10 of the FEIS.
178	A worst-case scenario and discussion of impacts from accidents are not included in the Draft Jurisdictional EPTR.	The worst-case scenario is a simultaneous explosion and burning of all four stages. For further information, please see Section 1.6.10.4 of the FEIS.
179	The selling back of missile sites to landowners in the area should be considered and addressed for future planning.	The Air Force foresees no availability of missile sites for disposal throughout the operational life of 20 to 30 years of either the Minuteman or Peacekeeper systems. Peacekeeper decommissioning would entail a variety of physical, socioeconomic, and environmental consequences. Several years will be required to establish realistic alternatives, plan for their implementation, conduct the required environmental reviews, and carry out the selected action. Congress, the Department of Defense, the Air Force, state and local agencies, and the public will participate in the process. All actions will be in strict compliance with the laws applicable at the time.
180	Table 1.6.7-2 of the DEIS and the same Table (Table 2.1.2-1) in the Draft Jurisdictional EPTR shows $647,000 for land acquisition. Will this be used to acquire farms and ranches? Has sufficient	The funds estimated for real estate shown on these tables are not programmed for QD easement acquisition. They are programmed for real estate costs associated with construction activities,

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	money been budgeted for this land acquisition?	for example short-term leases for storage of equipment and materials, parking areas and the like. Sufficient funds for land aquisition associated with QD will be available.
181	The EIS should address compensation to rural land owners for damages to crops during and after construction.	The owners of land crossed by cable routes will be compensated for the easements required to install and maintain the cable system. In addition, the U.S. Government will pay for any crops destroyed as a result of cable installation activities. For further information, please see Section 3.2.1.1.2 of the Final Land Use EPTR.
182	What activities will be permitted on cable easements? When will the cable easements be selected? What compensation will be provided?	Landowners would be allowed to carry out normal ranching or agricultural operations in the permanent right-of-way following cable installation. Decisions concerning selection of cable easements will be made after mid-1984. The owners of land crossed by cable routes will be compensated for the easements required to install and maintain the cable system. For further information, please see Section 1.6.3.3 of the FEIS and Section 3.2.1.1.2 of the Final Land Use EPTR.
183	The EIS should address the restoration of lands disturbed for Missile sites and cable lines to their original condition, or better, when the Peacekeeper or Minuteman III missiles are outmoded, have fulfilled their strategic purpose, or should Congress remove funding for the proposed project.	Present Air Force plans and programs indicate an operational life of 20 to 30 years for the Peacekeeper system. Peacekeeper decommissioning would entail a variety of physical, socioeconomic, and environmental consequences. Several years will be required to establish realistic alternatives, plan for their implementation, conduct the required environmental reviews, and carry out the selected action. Congress, the Department of Defense, the Air Force, state and local agencies, and the public will participate in the process. All actions will be in strict compliance with the laws applicable at the time. Land restoration would be considered at that time.
184	The EIS should examine the psychological and economic impacts on dislocated landowners.	Each of the landowners facing possible relocation has been contacted by the Air Force. However, specific individual psychological and economic impacts have not been evaluated. At this time, the Air Force has not determined that relocation will be required. These decisions will be made

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		after the Quantity Distance validation program has been completed, and will consider landowner requests for exemptions. If relocation is to occur, provisions of the Uniform Relocation Assistance and Real Properties Acquisition Policies Act will be followed. For further information, please see Section 3.1.10.4.2.2 of the FEIS.
185	What is the possibility that the safety zones might be increased even further? How will this be analyzed and what is the schedule for making this decision? What are the impacts on landowners who have structures within the Quantity Distance zones of the Peacekeeper missile silos?	It is possible that the safety zone may be either increased or decreased. The Air Force's validation of the requirements for increasing the safety zone from 1,200 feet to 1,750 feet is still being conducted. This will be validated through a testing and analysis program which will be complete in 1984. Once the safety zone distance (Quantity Distance) has been determined, landowners will be informed. Presently identified options for resolving the conflict between expanding the safety zone and continued occupancy of the residences include: 1. Sell the residence and the associated farm improvements to the Air Force, while keeping ownership of the land subject to Air Force restrictive easement. 2. Sell only the house to the Air Force at its fair market value and use the proceeds to build a new residence, or relocate the existing house, outside the Quantity Distance area. 3. For those families who would like to remain undisturbed, the Air Force would process a request to the Secretary of the Air Force for an exemption or they may propose other solutions for the Air Force to consider. For further information, please see Section 3.1.10.4.2.2 of the FEIS.
186	The Air Force should consider deployment of fewer missiles or missiles in alternative silos to avoid displacing landowners.	The President directed the deployment of 100 Peacekeeper missiles in Minuteman silos in the 400th and the 319th Strategic Squadron in southeastern Wyoming and western Nebraska. The other alternatives suggested have been evaluated and are not viable.
187	The Laramie River Power Station is inside the QD zone for a missile. Will you relocate the power	No facilities of the power station which meet Air Force criteria for relocation fall within the

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	plant?	1,750 foot Quantity Distance zone. Therefore, there are no plans or requirements to relocate the power station.
188	What kinds of buildings, construction and agricultural improvements are permitted within the QD safety zones? Are roads permitted in safety zones? Will they have to be relocated?	For planning purposes, Quantity Distance requirements for the proposed project are 1,050 feet to public traffic routes and 1,750 feet to inhabited buildings. It is assumed that exemptions will be granted for public roads as is the case for the current Minuteman system. The Air Force will acquire a restrictive easement over the area of 1,200 feet to 1,750 feet to preclude future encroachment of inhabited buildings. However, other uses such as agriculture will not be affected. For further information, please see Sections 1.6.10.5 and 3.1.10.4.2.2 of the FEIS.
189	The displacement of farmers and ranchers from their homes and land violates the spirit of an amendment to House of Representatives Bill 2575 (96th Congress) passed by the House of Representatives in 1979.	House of Representatives Bill 2575, which was a non-binding resolution historically tied to a previously-considered basing mode, directed that the M-X basing mode "...be restricted to location on the least productive land available..." The President selected the basing mode for the Peacekeeper, and Congress approved his selection. Peacekeeper deployment will make use of the existing silos, roadways, and support base and not remove any additional land from agricultural production. Though nine homeowners have been identified as being potentially affected by expansion of the safety zone from 1,200 feet to 1,750 feet, the increased safety zone would not preclude the use of the land for agricultural purposes. As in the case with the current Minuteman system, the land within the safety zone can be used for ranching and farming.
190	How is it in the best interest of the public to increase safety zones and then offer exemptions to those safety zones? What risks or standards are considered in making exemptions and how are the exemptions granted?	The Quantity Distance zone may be increased to prohibit future construction of inhabited buildings in the easement around Peacekeeper silos. The Air Force considers the risk of accidents to be very remote. Therefore, residents within the Quantity Distance zone will be informed of the risk of accident and offered an option to request an exemption and remain in place. Each exemption request will be considered on a case-

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		by-case basis by the Air Force.
191	The FEIS should include a relocation plan for families displaced by the Peacekeeper missile deployment.	The FEIS will not include a Relocation Plan. The Uniform Relocation Assistance and Real Properties Acquisition Policies Act will be referenced in the Authorizing Actions section of the FEIS. The final Quantity Distance (QD) criteria for inhabited structures will be validated after testing is completed in the spring of 1984. Based on these data and the affected landowners' preferences, decisions on relocation and acquisition will be made by the Air Force. The presently identified options for resolving the conflict between expanding the safety zone and continued occupancy of the residences include: 1. Sell the residence and the associated farm improvements to the Air Force, while keeping ownership of the land, subject to Air Force restrictive easement. 2. Sell only the house to the Air Force at its fair market value and use the proceeds to build a new residence, or relocate the existing house, outside the Quantity Distance area. 3. For those families who would like to remain undisturbed, the Air Force would process a request to the Secretary of the Air Force for an exemption or they may propose other solutions for the Air Force to consider. For further information, please see Section 3.1.10.4.2.2 of the FEIS.
192	It is the Air Force's responsibility to fully compensate dislocated families. They should receive full replacement value and be compensated for losses in property value due to increased safety zones.	The Air Force will pay the fair market value of the existing facilities. The cost of the replacement facilities will be determined by type and size of facilities the rancher wishes to construct; however, the payment for the existing facilities should be adequate to provide equally useable facilities. The cost of relocating the people and the ranching business will be mitigated by payment of relocation benefits which are separate from and in addition to the payment for the easement and the facilities.
193	How will the Air Force treat work buildings that are inhabited for extensive periods of time each day and lie inside the Quantity Distance zones?	The Air Force will have to review the facts in each case to determine which of the buildings are, under the terms of the regulations, inhabited

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		buildings. If the buildings are determined to be inhabited buildings, then the options available to the Air Force are to purchase the building, relocate the building or obtain an exemption from the regulation requirement. The Air Force is presently aware of only nine such situations among the 100 selected launch facilities. The FEIS addresses this issue in Section 1.6.10.5 and Section 3.1.10.4.2.2 of the FEIS and Section 3.5.1.2.2 of the Final Land Use EPTR.
194	Object to DEIS conclusion that "...impact on nine families living inside the quantity/distance zone are judged to be low and insignificant...". It is a serious impact of major concern that should be addressed in the FEIS.	
195	Will the Air Force use eminent domain to acquire the needed Q/D easements? If so, will it abide by state eminent domain laws? Will the Air Force offer compensation for the total destruction of a ranching or farming operation?	Implementation of an enlarged safety zone around the launch facilities for the Peacekeeper is discussed in Sections 1.6.10.5.1 and 3.1.10.4.2.2 of the FEIS. If the planning figure of 1,750 feet is ultimately approved, the Air Force will acquire the additional restrictive easements in accordance with federal law, including, if necessary, the exercise of eminent domain. The Air Force will offer just compensation for the real estate interest acquired. Additionally, relocation benefits will be paid to homeowners, where appropriate.
196	The Uniform Relocation and Real Properties Acquisition Act should be included in Appendix F, Authorizing Actions, and a relocation plan should be included in the FEIS.	In response to this comment, the Act has been added to Appendix F of the FEIS.
197	How will water rights to the Crow Creek watershed be acquired?	The Air Force will acquire all needed water in Wyoming according to the requirements of Wyoming water law. A document entitled "Peacekeeper Water Supply Development Plan - Wyoming Deployment Area" has been prepared for the Air Force and has been reviewed by the Wyoming State Engineer's Office and the Cheyenne Board of Public Utilities. At this time no single alternative has been chosen for the Crow Creek area. The alternatives are described in Section 5.1 of the referenced document and summarized in the Final Water Resources EPTR. If water rights were to be acquired, the present plan would be to purchase

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		existing water rights that show documented historic use.
198	Will the Air Force use water during drought conditions and will irrigators or priorities be impacted by the Air Force?	Water rights are prioritized by date. The Air Force will be required by state water law to protect senior rights or users. During drought conditions the Air Force will exercise any rights they may have acquired only if senior rights or user are protected. The date of the Air Force's priority will depend on whether new rights are required or existing rights are used. The Air Force would in all cases follow applicable water laws. The Final Water Resources EPTR discusses drought conditions and how the Air Force will acquire water.
199	How will the Air Force assist Cheyenne in obtaining water rights and paying for increased water use in Cheyenne?	The Air Force is providing technical assistance to Cheyenne relative to increasing yield of the Cheyenne wellfields. Mitigation of the increased use of water in the Cheyenne area during the deployment and operation of the Peackeeper system is one of many issues to be addressed in joint planning. Under the Memorandum of Agreement among the Department of Defense and the governors of Wyoming and Nebraska, a mitigation plan will be developed and agreed to by all parties. It will set forth specific measures to mitigate adverse impacts of deployment of Peacekeeper missiles.
200	Impacts on existing water rights should be addressed in greater detail.	The Air Force has considered the potential impacts on water rights very thoroughly, and detailed analyses are provided in the Draft and Final Water Resources EPTRs. Additional site-specific evaluations will be made when final water supply sources are selected. For further information, please see Section 2.2.1.2.2 of the FEIS and Section 2.6.2 of the Final Water Resources EPTR.
201	Will people who enter a temporary use agreement to provide construction water lose their water rights due to abandonment?	No. The temporary use statutes of Wyoming cover this type of use for construction projects such as Peacekeeper.
202	Relying on purchase or lease of water rights in Crow Creek watershed is not realistic in light of administrative problems and restrictions on	The Air Force has identified about 2,000 acre-ft/yr of rights in the watershed upstream of Cheyenne that might be purchased or leased.

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	time period of use, amount that can be transferred, and restrictions placed on the former user.	The restrictions on such use are described in the Final Water Resources EPTR and summarized in the FEIS. Water supply development planning for the project is examining this alternative along with others for Cheyenne.
203	The DEIS fails to discuss the impact of increased water use in the Cheyenne urban area on water diversions from the Little Snake River and the fact that such diversions are subject to the Upper Colorado River Compact which apportions water in this river between Colorado and Wyoming.	The DEIS shows the diversions mentioned (Figure 2.2.1-3) that are part of the Cheyenne Stage II project. The Draft and Final Water Resources EPTR indicate the Area of Concentrated Study does not extend to those areas from which water is imported since the environmental impact of bringing water to the area or increasing such imports are independent of the proposed project and have been previously addressed in a recent environmental impact statement on Cheyenne Stage II (USDA Forest Service, 1981). That document also discusses the various legal restrictions on water use such as the Upper Colorado River Compact.
204	Would owners of water rights be willing to sell or lease their rights to the Air Force?	The Air Force is committed to acquiring water in accordance with all applicable state water laws. Sale or lease of water rights is an individual decision that is up to the owner of the right. If water rights are bought or leased, the Air Force will negotiate with the individual right holder and follow all requirements to assure that the water right is legally obtained and used and the groundwater resource is protected.
205	Is condemnation a legal option to acquire water rights, and if so, what impact would it have?	Condemnation is a legal option to acquire water rights. However, the Air Force does not anticipate use of this procedure to acquire water for the project.

7.2 HUMAN RESOURCES

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206	Project annual employment rates imply that only unemployment relative to current unemployment is considered. There will also be problems in registering and servicing new contractors and new residents; they will be the responsibility of the Employment Security Administration.	The unemployment figures with the project, shown in Table 3.1.1-4 of the DEIS, consider all effective unemployment, whether or not the unemployed are qualifeid to receive compensation. While no additional staff requirements for the Employment Security Administration are anticipated, this could be monitored.
207	The DEIS states that a media program to discourage surplus job-seekers may be too expensive to conduct. This will add a strain on local service agencies due to an expanded recipient population. This will lead to an increased tax burden on the existing population.	The effectiveness of such a program and its costs must be weighed against the cost of servicing the additional surplus job-seeking population.
208	The employment demand section does not flow in a logical manner, and is difficult to follow.	This section has been revised. Please see Section 3.1.1.4 of the FEIS.
209	The Region of Influence is defined by a 60-mile radius from F.E. Warren AFB. Why is Denver also included?	Denver is the regional distribution center for the Employment Demand Region of Influence. Additionally, the northern portion of the Denver Standard Metropolitan Statistical Area is within the 60-mile radius. It is anticipated that many contractors will be located there.
210	Mitigation measures are generally stated; how such measures should be taken is not addressed.	Where possible, the FEIS addresses the effectiveness and procedures for the mitigative measures. For further information, please see Section 3.1.1.6 of the FEIS and Section 3.7.1 of the Final Socioeconomic EPTR.
211	The section on unavoidable adverse impacts is too brief.	This section is intended as a summary of the impact discussion. For further information, please see Section 3.1.1.7 of the FEIS.
212	Because the long term impact is rated as low, the actual effect will not be beneficial.	Although the long-term impact is rated as low, the income of many current residents will be increased through sales and earnings.
213	Baseline population forecasts should include population forecasts for other towns, particularly Gering, Scottsbluff, and Sidney (Nebraska).	The EIS includes population forecasts for Gering and Scottsbluff in Section 3.1.1.4. As no impact is allocated to Cheyenne County, Nebraska, no forecast is made for Sidney.
214	Additional information on the ethnic composition of Scotts Bluff County should be included in the	For reasons identified in Section 3.1.5.1 of the DEIS, Scotts Bluff County was not identified

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	EIS analysis.	as an Area of Concentrated Study, and therefore ethnic composition of the area is not discussed in the FEIS.
215	Regional employment growth was 5.7 percent annually from 1970 to 1980. How does this compare to the growth of population and labor force?	The population of the region grew at an annual rate of 2.8 percent over the period, while the labor force grew at an annual rate of 4.9 percent.
216	The growth from 1970 to 1980 of the labor force participation rate is attributed to the increased number of participating women. What is the documentation for this, and what other factors are included?	National employment statistics as summarized by the Bureau of Labor Statistics, and as reported in the census report "General population characteristics", and the Data Resources Inc. employment outlook, serve to document the increased participation by women. Other factors include general economic growth, which includes labor force growth, and improved employment opportunities.
217	Why were unemployment rates for the region studied when the Area of Concentrated Study is the area of concern regarding labor and inmigration?	While the Area of Concentrated Study is the choice for non-local labor to relocate, it is necessary to consider the regionally available labor force before determining inmigration. Workers from the Region of Influence outside the Area of Concentrated Study will also be affected, even in the absence of inmigration, as Region of Influence residents will be hired, including those not a resident of the Area of Concentrated Study.
218	Population allocation may be misprojected and exceeded,some time in the future due to the project. Additional impacts resulting from this should be mitigated by the Air Force.	A program of population monitoring has been presented as a mitigative measure in order to provide local decision makers with accurate and timely data with which to corroborate or correct project projections. Although the present analysis is considered to be "worst-case" or most severe, it is possible that after several years project forecasts could be exceeded. If this occurs additional mitigative measures could be warranted.
219	The EIS should address the numbers of people that will move elsewhere as a result of Peacekeeper deployment and the impacts of such inmigration on the community.	The analysis indicates that a net inmigration will occur. The impacts of this inmigration have been analyzed and reported in the FEIS. For further information, please see Section 3.1.1.4 of the FEIS.
220	Why were state population forecasts ignored by the Air Force when they were lower by 2,900	At the time of the DEIS preparation, the current state forecasts were not complete. The former

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	to 3,900 people over the forecast periods?	state forecasts were between 5,500 and 7,200 higher for Laramie County than the current state forecasts. The new state forecasts were utilized for the FEIS.
221	The issue of transients is not adequately dealt with and the impact is underestimated.	Transients are included in the DEIS, labeled "unsuccessful job-seekers". The unsuccessful job-seekers are more thoroughly addressed in the FEIS. For further information, please see Section 3.1.1.4 of the FEIS.
222	For planning purposes, age-sex data for the inmigrant population would be helpful.	Age-sex information is provided in Section 3.1.1.4 of the FEIS, and in Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
223	Kimball County officials suggest monitoring to assure the accuracy of population forecasts and the number of unsuccessful job seekers.	Noted.
224	The DEIS indicates 3,000 new jobs while only 1,744 jobs are needed with peak manpower requirements. Also, 3,500 new jobs implies inmigration of 10,000 people.	The 3,500 jobs include total jobs, both direct and nonproject jobs. The 1,774 jobs refers only to direct project jobs. The 3,500 jobs do not imply employment of only inmigrants. Many local workers will be hired. These numbers were recalculated for the FEIS. Please see Section 3.1.1.4 of the FEIS.
225	To avoid the problems associated with the project, local job-training programs, publicity to deter unsuccessful job-seekers and a job referral program are suggested.	These are discussed in Section 3.1.1.6 of the FEIS.
226	Manpower estimates do not include security forces for Peacekeeper.	Security forces for Peacekeeper are contained in the operations contingent of the direct manpower requirements.
227	Settlement of inmigrant population in South Cheyenne will cause many problems. Consideration should be given to dispersion of population or mitigation of other problems.	The allocation of population to South Cheyenne has been changed in the final analysis. For further information, please see Section 3.1.2.4 of the FEIS.
228	More people will seek work than are needed. How many transients will there really be? Is it accurate to base the number of transients on the number of jobs?	Unsuccessful job-seekers come to the area because they perceive jobs to be available. This perception of job availability is a function of actual jobs, and as such this method is used to

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		estimate the total number of unsuccessful job-seekers. For further information, please see Section 3.1.1.4 of the FEIS.
229	The impact population for Kimball, NE is understated.	The population forecast for Kimball has been revised. For further information, please see Section 3.1.1.4 of the FEIS.
230	The DEIS should include analysis of impact from other public, private, and Air Force projects planned over the next several years.	A few concurrent projects are expected. For further information, please see Section 3.5.1.1.2 of the Final Socioeconomic EPTR.
231	What work activities are included in the 600 new jobs which will remain after construction?	Approximately 475 workers will be directly employed by the Air Force in functions of security, operations and maintenance of the Peacekeeper Missile System. The remaining jobs are indirectly created and consist of general service.
232	Cheyenne County, Nebraska, is only 40 miles from Kimball, and should be included in the definition of the Region of Influence as project population will locate in Cheyenne County.	The 60-mile radius uses F.E. Warren AFB as its center. The spread of activity will be limited to the silo locations, and therefore to the closest communities. It is doubtful, with the activity centered at the base, that persons seeking work related to the project would relocate farther east than the Kimball area.
233	Use of non-local labor should also be considered in the significance criteria for employment demand as changes in the unemployment rate alone do not sufficiently measure the significance of the impact.	Non-local labor utilization is considered in the determination of Level of Impact. Employment changes are most often measured by the unemployment rate, and therefore this is the measure used for significance determination.
234	The media campaigns to discourage relocation of labor have not worked in the past, such as in Alaska.	Noted.
235	The suggested job training program is endorsed and should be implemented promptly.	Noted.
236	The local labor force will be better able to supply the job requirements than is shown in the DEIS, and thus the inmigration estimates are too high.	The inmigation estimates have been revised. For further information, please see Section 3.1.1.4 of the FEIS.
237	The Cheyenne Job Service should be used as the centralized agent for the Peacekeeper job referral	Noted.

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	service mentioned in Section 3.1.1-6 of the DEIS.	
238	The job service of Nebraska provides suggested locations for the Nebraska Job Referral Service.	Noted.
239	The Draft Land Use EPTR makes no reference to the possibility of surplus job-seekers inmigrating to the region.	A discussion of surplus job-seekers is contained in Section 3.1.1.4 of the FEIS.
240	The study does not provide sufficient data nor documentation of methodology with which to allow local decisionmakers to analyze potential impact.	The methodology for impact assessment is contained in the Final Socioeconomic EPTR. A summary of methodologies is presented in Appendix A of the Jurisdictional EPTR.
241	It is unclear whether the location quotients are applied to the 7-county Area of Site Influence or the 16-county Region of Influence. The method for regionalizing the national input-output is also questioned.	The 16-county Region of Influence is used and further study confirms the appropriateness of the method used to regionalize the national input-output.
242	The CETA program is no longer in operation. Therefore, impact analysis and mitigations concerning CETA are inappropriate.	This has been corrected in the final document. For further information, please see Section 2.2.2 of of the Final Jurisdictional EPTR.
243	The assumption that the ratio of transients to population will not change seems erroneous.	The ratio of transients to population does change because unsuccessful job-seekers are related to perception of job availability, not inmigrant population. For further information, please see Section 3.5.1.2 of the Final Socioeconomic EPTR.
244	Will it be difficult to fill local jobs because of high paying Peacekeeper jobs?	Given the small number of project-related jobs, local job openings should be filled without difficulty. The project is required by law to pay locally prevailing, not premium wages.
245	Price changes for materials as well as manpower are not considered.	There will be no long-term project-related impacts from inflation on the economy at large. Specific materials affected by price changes will include asphalt, aggregate, and some fabricated metal products. For further information, please see Section 3.5.4.2 of the Final Socioeconomic EPTR.
246	The basic impact assumptions set forth in the Jurisdictional EPTR are of questionable validity.	All assumptions, especially those specifically criticized in the comments received, have been reviewed for final documents. Those assumptions

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247	How is the minimum unemployment rate determined and does labor force participation change as a result of the project?	which have been found to be questionable or erroneous have been reformulated for purposes of baseline description and impact analysis. A minimum unemployment rate of 4 percent was chosen based on the economic forecast for the region. Because the Wyoming portion of the Region of Influence is forecast to have a sufficient quantity of available labor to accomodate project demand for non-skilled labor, it was not necessary to consider project-related changes in the labor force participation rate as a result of the project.
248	The Jurisdictional EPTR states the majority of inmigrants will be employed. Where will jobs for spouses come from? What is the source and employment opportunties for inmigrant spouses?	It is anticipated that spouses will be employed in indirect jobs generated by increased local economic activity associated with the project.
249	There is not a table describing historical migration rates at the county level for any county other than Albany County.	Historic migration rates for all other counties are presented in the Draft and Final Socio-economic EPTRs. For further information, please see Section 3.1.1.1 of the Draft Socioeconomic EPTR.
250	The baseline projections presented in the report are too high and do not reflect the current recession being experienced by the State of Wyoming.	Baseline population forecasts were revised due to updated economic forecasts. For further information, please see Appendix A and Tables A.1-8 to A.1-14 of the Final Jurisdictional EPTR.
251	The migration figures for Albany County between 1970 and 1980 do not justify an average annual growth rate of 2 percent per year over the projection period. If this is not the primary justification for a 2 percent average annual growth rate, then the authors of this study have not provided any justification for their projected growth rate. They need to provide some kind of explanation.	The use of national with local data apparently causes an upward bias in local growth rates. For this and other reasons we have revised our current population forecast to correct for this bias and to better reflect the population forecast made by the State of Wyoming. For further information, please see Section 3.1.1.4 of the FEIS.
252	Concerning p.3-1, Section 3.0 of the Draft Jurisdictional EPTR, the 68,600 to 87,638 population increase figure is questioned.	Based on new economic forecasts and in response to this and other comments, the population figures have been revised for the final documents. For further information, please see Appendix A.1 of the Final Jurisdictional EPTR.

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253	Table 2.3.3-4 and Table 2.3.3-3, which show baseline projections, are inconsistent.	The baseline forecast for the City of Laramie with respect to Albany county has been reformulated in response to this comment. For further information, please see Appendix A.1 of the Final Jurisdictional EPTR, which shows Laramie growth proportional to Albany County growth.
254	Project impacts did not consider cumulative effects of other projects in the area.	Future nonrelated project employment activity in the Area of Site Influence (i.e., cumulative effects) were considered in the economic forecast. For further information, please see Section 2.2.1.2 of the Final Jurisdictional EPTR and Section 3.5.1.1 of the Final Socioeconomic EPTR.
255	The assumption that high migration rates will continue is erroneous and underestimates the impact of the system.	These migration rates are based on the best information available. Sensitivity analyses were performed to determine the correlation with economic activity. The use of historic migration rates changed for some counties in response to comments for the final analysis.
256	How are special populations such as college students and military personnel handled for Laramie County in the demographic models used?	Military personnel are handled via alteration of age-specific net migration rates. This is also true of college student population in Albany, Laramie, and Weld counties.
257	The explanation of the area to which the vital rates pertain is not clear. Are the survival rates calculated for the Area of Site Influence or are national rates used?	Birth rates used were area-specific, while national death rates were used. Migration rates are area-specific.
258	The estimated population for F.E. Warren AFB of 3,700 does not correlate with estimated base employment and military dependents of 8,580 given on page 3-194 of the Draft Jurisdictional EPTR.	Base employment and military dependent estimates include civilian personnel which do not live onbase, as well as military and dependents living offbase. This has been clarified in the Final Jurisdictional EPTR.
259	The State's unusually high unemployment rate and lack of funds to deal with the impact-related problems should be rated.	This is noted and has been analyzed. For further information, please see Section 2.1.1 and 3.1.1.4 of the Final Socioeconomic EPTR.
260	The data derived concerning Laramie County employment is very poorly presented. The study totally ignores the problem in trying to manage	The worker requirements and employment data are described in greater detail in Section 3.5.1.2 of the Final Socioeconomic EPTR.

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	the impacts due to these two separate and distinct workforces.	
261	There will be a shortage of skilled workers in the temporary workforce.	The September 1983 report, "A Description of the Construction Industry and Peacekeeper-Related Labor Market Impacts in the F.E. Warren AFB Region," issued by Construction Resource Analysis, indicates that there are ample skills and no shortage of skilled workers expected. The 1980 to 1983 period shows an increase in area unemployment, especially when compared with national unemployment. This trend is expected to continue into 1984, and the resulting slowing of economic growth shows that the project will have a greater beneficial impact on the area unemployment rate. For further information, please see Section 2.3.3 of the Final Jurisdictional EPTR.
262	Employment and unemployment figures should address the period 1980 to 1983, not just the 1970 to 1980 period. These figures might reflect a beneficial impact on the area unemployment rate.	The discussion presented in the Draft Jurisdictional EPTR is brief. This discussion has been presented in more detail in the Final Jurisdictional EPTR. Additional information can be found in Section 3.5.1.1 of the Final Socioeconomic EPTR.
263	No discussion is made of simultaneous construction activities.	There are a few concurrent projects identified and considered as part of the baseline employment forecast. They are discussed in Section 2.2.1.2 of the Final Jurisdictional EPTR and Section 3.5.1.1 Final Socioeconomic EPTR.
264	No discussion is presented of simultaneous construction of the Joint Law Enforcement Facility with the Peacekeeper project.	The Joint Law Enforcement Facility is addressed in Section 2.2.2 of the Final Jurisdictional EPTR.
265	Inaccurate population baseline projections for Nebraska counties are presented.	Baseline population estimates were based on Nebraska age-cohort survival population estimates and related economic forecasts for the three Nebraska counties. Baseline population projections are revised to reflect updated economic forecasts and state population estimates. For further information, please see Appendix A-1 of the Final Jurisdictional EPTR.
266	The Draft Jurisdictional EPTR underestimates unsuccessful job-seekers.	The numbers have been reestimated. For further information, please see Section 2.3.3 of the Final

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267	Baseline population projections are provided for four principal subcomponents of the Cheyenne Urban Area. Similiar forecasts should be provided for the project-related population, including weekly commuters.	This breakdown is provided in the housing section and is clearly detailed in Section 3.2 of the Final Jurisdictional EPTR.
268	How valid are project population inmigration figures?	They are valid, as reported in Section 2.2.3 of the Final Jurisdictional EPTR.
269	Text statement "There are no adverse impacts resulting from the inmigrant population per se" is unsupported by documentation.	The statement has been revised to clarify its meaning. It was intended to imply that population induced impacts are evaluated in transportation, utilities, etc., but not simply by the presence of additional *people*, as stated in Section 2.3.3 of the Final Jurisdictional EPTR.
270	Population estimates in the Draft Jurisdictional EPTR were based on omissions of future oil industry activity in the region.	Population and related economic estimates did consider other planned activites in the region including the oil and energy industry and railroad transportation sector.
271	Population projections are too low.	Population projections were based on the latest Nebraska age/cohort estimates. Final population estimates have been revised and are based on the latest economic forecasts for the region.
272	What demographic characteristics are associated with inmigrant population?	Demographic characteristics of the inmigrant population are detailed in Section 3.5.1.2 of the Final Socioeconomic EPTR. Category specific incomes, family sizes, and accompaniment rates are specified, as are age-sex details for the inmigrant population.
273	If 3,700-4,000 new jobs are created, 10,000-12,000 people (workers and families) inmigrate. Therefore the impact population estimates are wrong.	There is not a direct correspondence between new jobs and population. In 1986, for example, there are 1,530 persons locally hired, and therefore there is no inmigration for these jobs.
274	It appears that the impact is being figured and added to the baseline projections. If this is the case then the remaining problem with the high baseline is that it implies certain mitigative measures are going to have to be undertaken	Noted.

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	whether or not Peacekeeper comes in, and this reduces the "impact" seemingly caused by the Peacekeeper in terms of capital facilities needs.	
275	Dispersion of population is suggested as mitigation to avoid the inmigration to the Cheyenne Urban Area.	This is considered as a possible mitigation in the Final Jurisdictional EPTR. It would require the contractor to provide either transportation or housing. For further information, please see Section 3.4 of the Final Jurisdictional EPTR.
276	Define "taxable construction materials". Why only $87.5 million for Wyoming?	Taxable construction materials refers to those materials subject to sales and use taxes. Fuels and some other materials are not subject to these taxes. Also, 39 percent of all deployment area work occurs in Nebraska. For further information, please see Section 2.2.1.1 of the Final Jurisdictional EPTR.
277	Personal income information for Laramie County is not included.	Background economic data, including personal income and known annual income by employment categories are included in greater detail in the Final Socioeconomic EPTR.
278	Fiscal impacts (sales tax) of the project were not addressed.	More detail is provided in the Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, to be released in early 1984. A summary is provided in Section 3.1.3.4 of the FEIS.
279	Economic conclusions are not supported in the document.	Support for economic conclusions is provided in detail in Section 3.5.1.2 of the Final Socioeconomic EPTR. The Jurisdictional EPTR provides a summary of the conclusions.
280	Greater disaggregation for total direct and indirect jobs per local and regional hires and inmigrants and weekly commuters, and more specific definitions of categories should be provided.	Estimates of total employment, direct and indirect, local and regional hires, inmigrants and weekly commuters have been revised. Categories used have been more clearly defined. For further information, please see Section 2.3.3 of the Final Jurisdictional EPTR.
281	A more exact definition of materials purchased by contractors is needed to determine sales tax base.	A more precise description of materials purchased by construction contractors is included in Section 2.1.2 of the Final Jurisdictional EPTR.
282	A more specific breakdown of material cost, volume, and procurement location is needed.	The construction materials and procurement information has been revised. Greater specificity

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		is provided in Section 2.1.2 of the Final Jurisdictional EPTR.
283	Local hire level is inaccurate based on historical Minuteman data.	Local hire estimates are based on a variety of variables, including the forecast of local labor market activity by Construction Resource Analysts, Data Resources Inc. third quarter forecast and input provided by local contractor representatives and the Wyoming Industrial Siting Administration.
284	A local hiring policy emphasizing greater local hiring especially for assembly and check out positions should be implemented.	The tightness of the silo modification schedule and the cost of delay of implementation of the project imply that local hiring for highly technical craft requirements due to time constraints would be limited and training for these positions would not be possible due to time constraints. For those skills which are locally available, a local hiring policy is being considered, based on seminars conducted by the Air Force with local contractor representatives, and local government officials.
285	Projected unemployment levels appear to be low and inaccurate.	Unemployment estimates utilized in the analysis were based on available information. These estimates have been refined and are corrected to reflect latest estimates of trends in unemployment. For further information, please see Section 3.1.1.4 of the FEIS.
286	Consideration needs to be given to the potential industry losses due to concurrent demand with the project.	These concerns are being addressed in the Fiscal Impact Analysis prepared by the Department of Defense, the Office of Economic Adjustment. For further information, please see Section 2.1 of the Final Jurisdictional EPTR. For further information, please see Section 3.5.1.2 of the Final Socioeconomic EPTR.
287	Simultaneous construction, such as housing replacement on the base, is ignored.	As mentioned on page 2-12 of the Draft and Final Jurisdictional EPTR, these projects are considered to occur independently of the project and are therefore included in the baseline discussions. For further information, please see Section 3.5.1.1.2 of the Final Socioeconomic EPTR.
288	The impact on city services and on city residents caused by the increased cost of services and the	The inflated cost of labor and services is addressed in general in Section 3.5.3.3 of the

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	inflated cost of labor should be addressed.	Final Socioeconomic EPTR.
289	Quarterly employment figures were not provided as agreed; instead quarterly average figures were provided.	Quarterly employment estimates are provided in the final documents. These indicate both peak and average employment. For further information, please see Section 2.3.3 of the Final Jurisdictional EPTR.
290	Last sentence objectionable...looks like union busting.	The text has been revised following consultation with unions. For further information, please see Section 2.4 of the Final Jurisdictional EPTR.
291	Total operational employment benefits do not distinguish the number of local hires.	The number of local hires resulting were distinguished from total new jobs in Table 2.2.1-2 of the Final Jurisdictional EPTR.
292	Suggest adding a toll-free hot line for job information to reduce the number of inmigrants seeking employment for jobs that are unavailable.	Noted.
293	The study makes no mention of agriculture in the area and how increased activity might affect agriculture and rural residents, both agricultural producers and residents of rural areas that are employed in non-farm and ranch jobs.	A study of agricultural impacts is provided. For further information, please see Section 3.1.10.4 of the FEIS and Section 3.2.2.1.2 of the Final Land Use EPTR.
294	Peak-year construction worker employment by craft is inconsistent with total construction worker data: Assembly and Checkout and Site Activation Task Force worker figures also need clarification.	Construction worker employment by craft is shown for peak quarter. Assembly and Checkout and Site Activation Task Force figures are specified for peak quarter. For further information, please see Section 2.1.1 of the Final Jurisdictional EPTR.
295	Are all Site Activation Task Force workers considered military?	No, not all Site Activation Task Force workers are military. Based on information from systems command, Approximately 40 percent of these workers are military.
296	Suggest monitoring of deployment activities and alteration of mitigation plans based on monitoring.	The Air Force is currently evaluating the appropriateness for a monitoring program.
297	Should be increased effort on the part of the governing bodies, Congress and the Department of Defense to locate one or two industrial	The post-construction decline is not perceived to severely affect local industry. Subsequent industrial development would benefit the Cheyenne

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	developments in Cheyenne to mitigate downside cycle.	area at a much greater level than would be needed from the project.
298	Price effect on ready-mix, sand and gravel, and their decreased availability should be addressed.	Analysis of the price effects and availability of materials has been addressed in Section 3.5.4.2 of the Final Socioeconomic EPTR.
299	A potential problem is the effect of increased demand for consumer loans by the increased population due to the project on the cost and availability of lower funds for production agriculture.	Consumer loan demand impacts are discussed in the banking Section 2.4, of the Jurisdictional EPTR. No such discussion of loan activity with respect to agriculture would contradict the conclusions presented there.
300	Erroneous to consider other base construction activities as part of the baseline condition.	These projects are considered to occur irrespective of the project and are therefore are part of the "without project" or baseline condition.
301	Construction schedule start date is unreasonable, given climatic conditions.	The construction start schedule has been judged by engineering experts to be reasonable.
302	Does construction start in Spring '84 or Spring '85?	Construction of Defense Access Roads improvements are scheduled to begin in Spring 1985, though it is anticipated that a great deal of the onbase building work would begin in 1984.
303	Construction materials spending schedule is inconsistent with construction employment schedule.	These schedules are not dependent on one another. Procurement is generally made in advance of employment.
304	A 90 percent completion date should be provided.	An estimated 90 percent completion date will be provided for the Fiscal Impact Analysis.
305	Spread out construction phase over a longer period of time, especially for road construction.	The schedule for completion of the project is determined by the Air Force based on a large number of considerations. Foremost among these is national defense. Initial operating capability is scheduled for late 1986, while final operating capability is scheduled for late 1989. It is doubtful, given these considerations, that a longer construction phase would be acceptable.
306	Proposed mitigative measure that contractors deposit a large certificate of deposit in a bank or in a group of banks at an interest rate	Noted.

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	favorable to the banks is not realistic. A more direct deposit method will be necessary to free up large amounts of excess cash to the bank.	
307	Air Force contractors should formulate a specific policy to implement check cashing by employees to assure (a) employees can cash checks readily and (b) no undue burdens are placed on local banks.	Noted.
308	There is a logical inconsistency with no impact rating in the Jurisdictional EPTR. The overall impact rating and the housing impact are contradictory.	There is no inconsistency between the overall impact rating an the housing impact, because the overall rating includes factors other than just the housing impact.
309	Indirect population and related economic effects have not been addressed for the City of Scottsbluff.	Total population and related economic effects have been addressed. They include consideration of direct and indirect elements of each for all the Area of Site Influence including Scotts Bluff County and the City of Scottsbluff.
310	The population allocation model assumes that workers will locate in larger towns. This seems reasonable only if they bring their families. Otherwise, single workers may wish to live closer to their work, in the small towns. The impacts on such small towns should be addressed.	This has been reevaluated in the final analysis. Please see Section 3.1.1.4 of the FEIS.
311	Actual tax revenues should be presented rather than only taxable sales. This omission is misleading and shows a lack of balance in the analysis.	Actual revenues are detailed in the Final Socioeconomic EPTR. For further information, please see Section 3.1.3.4 of the FEIS and Section 3.5.3.1 of the Final Socioeconomic EPTR.
312	The study assumes unrealistically that only the number of workers needed for the project will come to the area. The study should assess the impacts of the increased burden if, for example, 5 percent more workers than can be employed arrive seeking jobs.	A contingent of unsuccessful job-seekers of from 5 to 8 percent in excess of job requirements was included in inmigration estimates. This has been reevaluated. For further information, please see Section 2.2.3 of the Final Jurisdictional EPTR.
313	If local youth are trained for project jobs, what are their prospects at the end of the project? Will they not have to move out of state to utilize those skills?	This is possible, but expansion of economic activity other than that related to the project should require these workers after the project.

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314	A temporary project worker facility is recommended to be provided by the Air Force rather than by a private developer. Suggestions for land use of such a facility include Laramie County Community College or Johnson Jr. High School, rental housing or neighborhood service offices.	The private housing market is projected to be sufficient to supply housing for construction workers. However, construction contractors will be free to provide worker housing if they decide that it will be advantageous.
315	What happens to the excess supply of housing after 1990? Will there be any impact beyond 1990?	According to the DEIS, project impact will continue past 1990 as a result of excess supply. Excess supply, past 1990, will be absorbed by baseline growth. Impacts will extend to 1992 for mobile homes as a result of project demand. For further information, please see Section 3.1.2.4.2 of the FEIS.
316	Why does the proposed length of impact for single family housing for both growth and decline cycles not exceed a 5 year period?	Single family housing was projected to experience a 3-year growth cycle and a 3 year decline cycle condition (Table 3.1.2-1 of the DEIS). Impacts were considered short-term, in that impacts for both growth and decline cycles did not exceed a 5-year period, resulting in a long-term impact. For further information, please see Section 3.1.2.2 of the DEIS.
317	A review of plans, policies and regulations is not mitigation.	An update of plans and policies and the adoption of mobile home and recreational vehicle park regulations has been recommended as one means of mitigation. This action may not reduce the demand for any particular housing type but will help to avoid degradation of housing supply as a result of the proposed action, and in addition, should enhance the quality and affordability of new housing in general. For further information, please see Section 3.1.2.4 of the FEIS.
318	Beneficial effects due to sales value and rental income are temporary in nature.	Beneficial effects may result in the short-term for the supplier in terms of sales value and rental income due to rate increases, and adverse impacts may result for the tourist or day traveler in terms of higher rates, as a consequence of a fixed housing supply and an increased consumer demand. In addition, beneficial effects may result in the long term in the form of lower

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		rents for those workers who will occupy units on a long-term basis.
319	The City of Cheyenne Mayor's Impact Team, Housing Subcommittee, provided their conclusions.	Noted.
320	An early decision regarding provision of short-term worker housing facilities is needed. Such facilities should be converted to community use at the conclusion of the project.	The private housing market is projected to be sufficient to supply housing for construction workers. However, construction contractors will be free to provide worker housing if they decide that it will be advantageous.
321	The number and percent of vacant lots in the county should be addressed.	The number and percent of vacant lots in the county are identified in the Housing and Vacant Land Survey. This information is included in Appendix B of the Final Jurisdictional EPTR.
322	The elected officials need to become familiar with the options available for less high impact housing and what policy decisions must be made for implementation.	Noted.
323	Housing built as a result of the project should be designed for reuse/renovation for community uses upon project completion.	Based on new forecasts, housing supply additions will be absorbed by projected baseline growth.
324	Mobile home developments should be dispersed throughout Cheyenne and the region rather than concentrating them in South Cheyenne.	Mobile home allocations were based on an analysis of city/county plans, policies and regulations. For further information, please see Section 3.1.2.4 of the FEIS and Section 3.5.2.3 of the Final Socioeconomic EPTR.
325	Why are impacts on multifamily housing low and not significant?	Multifamily housing impacts are low and not significant during the growth cycle, when demand exceeds projected net vacancies and the market response would be within the range of historic production levels. Impacts are negligible and significant (greater than 2-year impact) during the decline cycle, when vacancies resulting from decreases in project demand will be absorbed by baseline growth. For further information, please see Section 3.2.3.5 of the Final Socioeconomic EPTR.
326	Will the current housing preferences and lot size requirements continue? As	During the construction/growth cycle, it is not anticipated that housing costs would increase to a

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	housing costs increase, the trend may change to smaller houses and lots, or to more attached housing. Would these changes have any effect on the baseline future for Cheyenne?	level that would shift housing preferences substantially.
327	Problems associated with acquiring necessary capital (availability of financing) for mobile home development in South Cheyenne have been understated.	The availability of capital for mobile home park financing is typically contingent on, among other things, availability of utilities and services and competitive market conditions. Housing requirements have been modified. For further information, please see Section 3.1.2.4 of the FEIS.
328	DEIS projects 712 excess supply units of mobile homes during the decline cycle.	New data related to project impacts indicates that there will be a decreased demand for mobile homes and therefore a lower excess supply during the decline cycle. For further information, please see Table 3.5.2.6 of the Final Socioecomonic EPTR.
329	Explain why projections of mobile homes to South Cheyenne were made in spite of a city decision to disallow mobile homes in that area.	Projections of mobile homes to South Cheyenne were made prior to the water and sewer moratorium. Mobile home allocations were based on an analysis of city/county plans, policies and regulations. Based on new data and revised methodologies, new allocations were developed which indicate considerably lower mobile home requirements. For further information, please see Appendix B of the Final Land Use EPTR.
330	A review of plans, policies, and regulations is not mitigation.	An update of plans and policies and the adoption of mobile home and recreational vehicle parks regulations has been presented as one means of mitigation. This action may not reduce the demand for any particular housing type but will help to avoid the degradation of housing supply as a result of the Proposed Action and in addition should enhance the quality of and affordability new housing in general.
331	The provision of housing for transients who unsuccessfully seek Peacekeeper-related work in Kimball County needs to be addressed.	The issue has been addressed based on the housing resource assumptions and methodology. Transients will be accommodated in temporary accommodations (hotel/motel, campgrounds) based on new data.
332	Mitigation measures are too general.	Mitigation measures have been more clearly defined in Section 3.7.2 of the Final Socioeconomic EPTR.

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333	Changed densities in mobile home parks should be suggested as a mitigation measure.	This suggestion is considered in the final analyses. For further information, please see Section 3.2 of the Final Jurisdictional EPTR.
334	The negligible impact on hotel and motel rooms, and campground spaces is disputed. The Draft Jurisdictional EPTR indicates that all vacancies will be absorbed by project demand, adversely affecting the tourist trade.	Housing impacts were based on the weighted average occupancy rates which included consideration of the tourist season in assessing the use of hotels and motels for construction worker housing. It has been determined that potential adverse effects, as a result of increased occupancy levels of the hotels due to the influx of temporary workers, could occur during the heavy demand period of Frontier Days and the Wyoming Legislative session. Operators of motels though, they verified that they will reserve space for those long-term clients associated with the project, yet it is possible that project workers affected by tourist demand will have to commute on a daily basis during these periods. Project impacts for the balance of the year are projected to be negligible due to baseline vacancies, which will absorb project demand.
335	Cheyenne's existing plans and policies should be followed and not modified to expedite project development.	The identified mitigation was not intended to "loosen" development standards but to review those regulations and amend, if feasible, standards which could be modified and that could ensure quality, yet reduce housing costs. For further information, please see Section 3.7.2 of the Final Socioeconomic EPTR.
336	The effect of projecting continued vacancies in the baseline case is to reduce the net impact forecast with the project.	There are vacancies projected in the market that will be absorbed by project-related growth, prior to a market response. It is assumed that a portion of the vacancies i.e., frictional, will continue. This in fact will reduce net impacts but more typically will reflect communities that experience these growth conditions.
337	The number of projected dwelling units required under the baseline condition is estimated based on a constant multiplier of household size. This assumption of a constant household size multiplier is not acceptable.	The projected number of dwelling units was based on the assumption that increases or decreases in household size factors would be so small so as not to substantially affect the projected number of baseline housing units to any great degree. The

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		specific household size factors are summarized in Appendix A.3 of the Final Jurisdictional EPTR.
338	Using the same housing preference assumptions for three different and distinct categories of workers is questioned.	Housing allocations were based on different housing preference and household size factors for distinct worker categories. These factors were based on analysis of a recent housing survey of construction and operations workforce housing studies. For further information, please see Appendix B of the Final Jurisdictional EPTR.
339	In the analysis of project impacts, insufficient information is provided on the net vacancy rate, total vacancy rates projected, and frictional vacancy rates to adequately analyze the projections.	Additional information regarding net, total and frictional vacancy rates, and net housing demand by unit type has been provided. Based on housing preference by worker type and definitions of weekly commuters, the demand for housing by unit type is adequately projected. For further information, please see Appendix A.3 of the Final Jurisdictional EPTR.
340	It is agreed that the mitigation of housing impacts caused by the project would require that quality housing be made available in a timely, affordable fashion. The means to accomplish this goal are not provided within the mitigative measures listed.	The presented mitigation measure of conducting housing demand forecasts for the various jurisdictions to provide buyer profile by type, size, price, etc., is one means for aiding development to occur in a timely, affordable and quality fashion. Ultimately, the decision to develop the type and quality of housing is the responsibility and decision of the developer and the market response will determine the acceptance or rejection of such decisions.
341	Lowering of housing standards to facilitate the construction of needed housing is unacceptable.	The identified mitigation was not intended to lower development standards but to review those regulations and amend, if feasible, standards which could be modified that could ensure quality and yet reduce housing costs. For further information, please see Section 3.7.2 of the Final Socioeconomic EPTR.
342	No assessment of transient housing is made.	All issues with respect to transients have been reevaluated and are more completely specified. Please see Section 3.5.2.2 of the Final Socioeconomic EPTR.
343	The number of apartment units is severely underestimated.	The analysis contained in the Jurisdictional EPTR only discusses apartment complexes of 10 or more

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		units. Housing supply information by defined unit type has been reevaluated based on the Land Use and Housing Condition Survey. This information is included in Appendix B of the Final Jurisdictional EPTR.
344	What is the Fox Farms area mentioned on page 3-37 of the Draft Jurisdictional EPTR?	The Fox Farms area is a developing neighborhood in southeast Cheyenne.
345	Why is Cheyenne's projected housing distribution of mobile homes stable when historic 10 year data show major change.	Cheyenne's distribution of mobile homes has fluctuated considerably over the past 10 years. Yet, during the 1980 to 1983 period, the percent distribution has approximated 12 percent. It is projected that this baseline distribution will continue over the project period. For further information, please see Section 3.2.12 of the Final Socioeconomic EPTR.
346	The validity of basing the vacancy rate determination on a limited sample of apartment units is questionable.	Future vacancy rates were estimated based on current vacancy rates identified in real estate multiple listing services, state housing planning data, and the annual Federal Home Loan Board's housing vacancy study.
347	How do housing issues relate to other facets of the community, such as land use and government services?	Project housing demands are a significant determinant of other community impacts including that of land use, utilities, energy, public finance, and government services. In effect, household size and related net demand for housing is interrelated with these other areas of analysis.
348	How can housing demand forecasts be made available at least 12 months before construction start-up?	Although current data indicates project demand for housing in 1984, housing supply additions do not occur until 1985. Under this time frame, forecasts for new housing units can occur at least 12 months before the demand.
349	The study makes it clear that the Air Force has no plans for a full service residential facility and offers little or no guidance to the community concerning ways to deal with this major problem.	Due to revised baseline and projected population and housing forecasts, housing demands will not require the construction or development of a full service residential or construction worker facility.
350	Shouldn't consideration be given to requiring the Air Force to construct/develop housing,	Due to revised baseline and projected population and housing forecasts, housing demands will not

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	as has been required of private projects in other impacted communities?	require the construction or development of a full service residential or construction worker facility.
351	Disagree that there should be review and amendment of local development regulation, plans and policies.	The identified mitigation was not intended to "loosen" development regulations, plans, and policies but to review those documents and amend, if feasible, standards which could be modified and that could ensure quality and yet reduce housing costs. For further information, please see Section 3.2.1.3 of the Final Jurisdictional EPTR.
352	Suggest a licensing board to prevent substandard homes from being built.	The City's building code sets minimum standards which builders must follow. Laramie County is currently considering adoption of a building code.
353	Problems associated with mobile and temporary housing are not addressed sufficiently.	Current data indicate that impacts for mobile homes and temporary accommodations are significantly lower that the analysis indicated in the Draft Jurisdictional EPTR analysis. For further information, please see Section 3.2.1.3 of the Final Jurisdictional EPTR.
354	The population projections and impact effects on Pine Bluffs and other eastern Laramie County communities have been substantially understated and differ from state projections.	All population projections have been reassessed in light of recently available information. For further information, please see Section 3.1.1.4 of the FEIS.
355	The Land Use Committee suggests that the over-supply of housing in Wheatland be considered as a resource.	Noted.
356	There is a concern for housing the unemployed who are attracted to the community.	Because of comments received, the transient population has been specified more completely in all analyses.
357	The study appears to underestimate the demand for multifamily housing.	Housing preferences are based on salary levels and employment categories for the principal family worker as well as historical information on housing choices by worker type. To the extent that inmigration by worker type has also been reassessed, multifamily housing demand has been reevaluated. For further information, please see Section 3.1.2.4 of the FEIS.

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358	Housing analysis must be determined prior to other impact assessments including positive/ negative impact value judgments.	This is recognized to be true. All project impacts may be judged to have both positive and negative effects. Both were considered in the analysis process. Individuals' value assessments may differ in these regards.
359	Contractor-provided housing should be a project requirement.	The provision of "man-camps" or other contractor-provided housing is left to decision of the individual contractors at this time.
360	The decision concerning location and type of housing units should be a variable and alternative scenarios should be analyzed in the Jurisdictional EPTR.	The Wyoming Industrial Siting Act was used as a guideline to the evaluation of the most likely scenario. However, considering the latest information, including the moratorium on water taps in South Cheyenne, both baseline and impact population allocations to all neighborhoods were reevaluated.
361	Speculative developments should not be included in the Jurisdictional EPTR.	Planned developments for which permits have not been received were not incorporated into baseline housing forecasts, but only noted, as required by the Wyoming Industrial Siting Administration.
362	The suggestion that workers living in a hotel on a permanent basis and move out during Frontier Days seems unlikely.	Housing impacts were based on the weighted average occupancy rates which included consideration of the tourist season in assessing the use of hotels and motels for construction worker housing. It has been determined that potential adverse effects, as a result of increased occupancy levels of the hotels due to the influx of temporary workers, could occur during the heavy demand period of Frontier Days and the Wyoming Legislative session. Operators of motels though, have verified that they will reserve space for those long-term clients associated with the project, yet it is possible that project workers affected by tourist demand will have to commute on a daily basis during these periods. Project impacts for the balance of the year are projected to be negligible due to baseline vacancies, which will absorb project demand.
363	The use of hotels and motels for construction worker housing would have adverse consequences on	Housing impacts were based on the weighted average occupancy rates which included consideration of

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	the tourist industry in the area. These effects should be considered before assuming that housing for construction workers is available through the use of hotels and motels.	the tourist season in assessing the use of hotels and motels for construction worker housing. It has been determined that potential adverse effects, as a result of increased occupancy levels of the hotels due to the influx of temporary workers, could occur during the heavy demand period of Frontier Days and the Wyoming Legislative session. Operators of motels though, have verfied that they will reserve space for those long-term clients associated with the project, yet it is possible that project workers affected by tourist demand will have to commute on a daily basis during these periods. Project impacts for the balance of the year are projected to be negligible due to baseline vacancies, which will absorb project demand.
364	Residential growth in South Cheyenne will be a problem. How were population figures allocated?	Housing allocations in South Cheyenne were based on net housing demand preferences by location and worker type and according to city/county land use policies. The methodology is discussed in greater detail in Section 3.5.3 of the Final Land Use EPTR.
365	Price effects on housing and other items are not discussed. The statement "there are no adverse impacts resulting from the inmigration population per se" is unreasonable.	The quoted statement is meant to imply that the effects of population increase are contained in the housing, utility, transportation, recreation, and public services (etc.) analyses. Numbers of people, in and of themselves, do not constitute an impact until they demand the resources associated with the aforementioned analyses. For further information, please see Section 3.5.1.1.3 of the Final Socioeconomic EPTR.
366	Trends, especially with regard to mobile homes, can't continue as they have.	Mobile home estimates were based on a comparison of 1970 and 1980 census of housing data, available housing start data (1980-1983) by household type for the City of Cheyenne. All housing availability assumptions have been repostulated based on information obtained in the Housing and Vacant Land Study, which is contained in Appendix B of the Jurisdictional EPTR.
367	The study underestimates mobile home spaces.	All housing availability assumptions have been repostulated based on information obtained in the Housing and Vacant Land Study, which is contained

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		in Appendix B of the Jurisdictional EPTR.
368	How was it determined that 762 units of housing demand would be met by mobile homes? Given the quality and location of many local mobile home parks this seems unlikely.	The net demand for mobile homes was determined on the basis of worker housing preferences and existing and planned mobile home stock by location within the city. Both the quality and location of the mobile home parks were considered in this determination.
369	The study incorrectly estimates the allocation of persons to temporary housing in South Cheyenne.	Considering the latest information, including the moratorium on water and sewer taps in South Cheyenne, both baseline and impact population allocation to all neighborhoods including those in South Cheyenne, were reevaluated. For further information, please see Section 3.2 of the Final Jurisdictional EPTR.
370	How are housing demands to be met? Are South Cheyenne services adequate for quantity and location of proposed housing?	Demand is to be met by baseline vacancies and by supply additions in the market. In light of the projected baseline growth which indicates substantial increases, and impact growth which is negligible, revised housing demand forecasts for mobile homes in South Cheyenne are significantly lower than the previous analyses based on new data. Mobile home net demands will not exceed 142 units at the peak of the construction activity. In addition, it is anticipated that there will be no major impacts on utilities as a result of this lower housing demand. For further information, please see Section 3.2 of the Final Jurisdictional EPTR.
371	A major mobile home park development is described to include 500 spaces located in, and serviced by, the City of Cheyenne. If this park is developed, then the assumptions regarding geographical location of inmigrating families in South Cheyenne Water and Sewer District would appear to be erroneous. More information should be provided on the current status and probability of development of this major new park.	The 500-unit mobile home park was a local developer's proposal that was never submitted to the Planning Department. Housing allocations by geographic area, including neighborhoods, were revised based on the subsequent Housing and Vacant Land Study. For further information, please see Appendix B of the Final Jurisdictional EPTR and Section 3.6.2.1 of the Final Socioeconomic EPTR.
372	Selection of South Cheyenne as a location for the majority of project population should be considered as an alternative, rather than as a	The Wyoming Industrial Siting Act was used as a guideline to the evaluation of the most likely scenario. However, considering the latest

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	given.	information, including the moratorium on water taps in South Cheyenne, both baseline and impact population allocations to all neighborhoods including those in South Cheyenne were reevaluated.
373	The city and developers should consider temporary mobile home parks in South Cheyenne.	This suggestion is taken into consideration, although it is doubtful that temporary mobile home parks would be an acceptable solution. Allocations to the Cheyenne area as well as all neighborhoods therein have been reevaluated based on the recent moratorium on water taps and the Housing and Vacant Land Study. For further information, please see Appendix B of the Final Jurisdictional EPTR.
374	The housing summary indicates there are no significant impacts. This is misleading for people who don't read the entire text.	The text in Section 3.2 of the Final Jurisdictional EPTR has been corrected.
375	Will the "type" of workers coming here want to live in mobile homes?	Studies indicate that certain worker types prefer mobile home accommodations. Based on these studies, we have estimated the percent of workers that would live in mobile homes and allocated these according to availability and county and city development plan recommendations.
376	The impact on motel accommodations does not reflect the fact that the tourist and construction seasons coincide.	Housing impacts were based on the weighted average occupancy rates which included consideration of the tourist season in assessing the use of hotels and motels for construction worker housing. It has been determined that potential adverse effects, as a result of increased occupancy levels of the hotels due to the influx of temporary workers, could occur during the heavy demand period of Frontier Days and the Wyoming Legislative session. Operators of motels though, have verified that they will reserve space for long-term clients associated with the project, yet it is possible that project workers affected by tourist demand will have to commute on a daily basis during these periods. Project impacts for the balance of the year are projected to be negligible due to baseline vacancies, which will absorb project demand.

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377	Allocation of people to motels during peak tourist season is in conflict with local goals and therefore inaccurate.	Housing impacts were based on the weighted average occupancy rates which included consideration of the tourist season in assessing the use of hotels and motels for construction worker housing. It has been determined that potential adverse effects, as a result of increased occupancy levels of the hotels due to the influx of temporary workers, could occur during the heavy demand period of Frontier Days and the Wyoming Legislative session. Operators of motels though, have verified that they will reserve space for those long-term clients associated with the project, yet it is possible that weekly commuters affected by tourist demand will have to commute on a daily basis during these periods. Project impacts for the balance of the year are projected to be negligible due to baseline vacancies which will absorb project demand.
378	Before it can be assumed that spaces would be available to construction workers for recreational vehicles parking on a long-term basis, campgrounds should be surveyed to determine amenities offered.	A detailed survey of campgrounds, including size, space availability and amenities offered, was conducted. Although not specifically detailed in the analysis, specific factors regarding suitability as temporary housing accommodation were considered.
379	Reconstruction of Wherry Housing should be phased to permit new units to take the place of any that may be removed from the base housing stock.	That is the current plan.
380	Since the projected inmigrants are likely to be higher paid than much of the local population, the housing impacts may displace local people and increase rents rather than merely fill existing vacancies.	This possibility is discussed in the housing and social well-being sections of the Socioeconomic EPTR.
381	The no-impact finding for mobile home spaces in Scotts Bluff County is questionable. A shortage is projected in 1987 and 1988, but no plans for expansion of parks are contemplated. Rather a suggestion to ease housing and zoning codes is given without a specific analysis of potential impacts on the zoning authority and the citizens.	Section 8.1.4.3 of the Final Jurisdictional EPTR notes that in 1987 and 1988, there will be a net demand of 35 and 19 mobile homes respectively for the City of Scottsbluff. The city will experience impacts from mobile home demand but not for single family or multifamily homes. Section 3.1.4.3.4 of the Final Socioeconomic EPTR presents

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		mitigation measures. The reference to mitigation measures in Section 1.0 of the Draft Jurisdictional EPTR was presented only for the Cheyenne area.
382	The no-impact finding for weekly commuter housing in Kimball is suspect, considering the amount of motel space available. Using the figures in the study, extrapolation shows that where there will be adequate motel space in the off season, there will be a serious shortage during the summer. The study should discuss the potential adverse effects on tourism in Kimball.	During the summer (peak) season in the City of Kimball, there will be available 14 franchised hotel rooms and 30 non-franchised hotel rooms. In addition, campgrounds will provide 63 spaces. The combined total of temporary accomodations for the City of Kimball shows 107 temporary accommodation units are projected to be available. These units could provide for the weekly commuter population, which will need only 25 units for a net demand of zero. For further information, please see Section 7.7.3.1.7 of the Final Jurisdictional EPTR.
383	Housing methodology and assumptions need clarification, as well as the provision of a census tract map.	Housing preference by worker type has been revised and clarified including that of vacancy assumptions. These are included in the FEIS. Housing allocation by census tract is aggregated to the neighborhood level and summarized in map form. For further information, please see Appendix B of the Final Jurisdictional EPTR.

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384	Are there hidden costs which are not mentioned?	The potential for revenue enhancement and expenditures for services by local governments has been examined with respect to all identifiable revenue sources and expenditure items. No hidden costs have been identified.
385	Why are impacts characterized as not significant when the city/county jail construction may have to be delayed and taxes increased?	The deferral in construction of the joint city/county jail and possible tax increases are a result of conditions unrelated to the project and would occur in the No Action alternative as well as in the Proposed Action. Although this may have negative effects on Cheyenne residents, it is not a result of the project. Thus adding the Proposed Action would not make this impact any more significant.
386	Can the criteria for what is a significant impact be changed? Currently impacts are not considered significant unless project impacts necessitate changes in existing fiscal policy, tax structures or bonded indebtedness or if they only cause reductions in service levels and temporary increases in taxes or service charges.	The definitions of levels of impact and significance provide a summary evaluation of the budgetary response potentially required by a governmental jurisdiction as a result of the project. Unless such a response necessitates the imposition of increased disproportionate tax burdens (tax rate or structure charges) upon indigenous populations or limits the future capital construction opportunities of a jurisdiction through reduced bonding capacity, it is not considered to be a significant budgetary modification. Parallel adjustments in revenues and expenditures within normally experienced time variances are considered to be normal responses to economic growth and decline.
387	Is the tax portion of the high impact definition valid since some governmental entities are already at their taxing limit and will not be able to raise rates by law?	Where jurisdictional taxation rates are currently at their legal limit and additional funds are required as a result of the project for the maintenance of existing service levels, a fiscal action (special tax election) is required to increase the maximum limit.
388	The DEIS has been reviewed and the contents are adequate.	Noted.
389	City of Kimball is projected to gain in city carry-over fund in 4 of the 10 years and will lose	A Fiscal Impact Analysis prepared by the Department of Defense Office of Economic Adjustment

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	in 6 and 10. Are federal subsidies available to impacted rural cities and, if so, how much?	concurrent with the FEIS evaluates the fiscal impact upon communities directly affected by the project. This report will be used in considering impact assistance. Tax and fee increases are not suggested as mitigation measures.
390	Many of the mitigation measures identified in the DEIS, such as fee and tax increases, are not mitigation, but rather a shifting and spreading of the negative impacts across the entire population.	The mitigations included in the FEIS represent a wide range of alternative approaches available to offset potential fiscal impacts upon governmental jurisdictions. A Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, concurrent to the FEIS, evaluates the fiscal impact upon communities directly affected by the project. This report will be used in considering impact assistance.
391	What is the "public agency" which will fund the water and sewage treatment systems built for temporary construction worker housing?	The public water and sewage treatment system is adequate to serve the temporary increased population. However, extensions of service lines will be needed to access the public system by the worker camps. These costs would be borne by the private developer who would reimburse the City of Kimball combined utilities fund for the hook-ups.
392	The school finance portion of the public finance section should be revised to include information from the Wyoming Department of Education.	Subsequent to the DEIS, additional information concerning school finances was obtained and incorporated into the FEIS. For further information, please see Section 3.1.3.1 of the FEIS and Section 3.5.3.1 of the Final Socioeconomic EPTR.
393	The City of Cheyenne and Laramie County's budgets are smaller than those of similar communities and counties within Wyoming because their tax base is smaller. Will this project improve their tax base over the next ten years?	The effect of the project on the tax base of the City of Cheyenne and Laramie County will be primarily an acceleration of their rate of growth over the next ten years. The post-1991 tax base projection with the project is expected to be essentially equal since reduced Peacekeeper economic impacts are expected to be replaced by the effects of normal projected economic growth.
394	Can the Air Force require all its contractors and subcontractors to obtain a Wyoming sales tax license to decrease the lag time between sales tax collections and tax revenue dispersed to public service provides?	The requirement of Wyoming sales tax licenses by project contractors and subcontrators, where applicable, has previously been advocated. However, since construction material taxes for major projects are generally assessed as "use

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		taxes" based on total material values rather than "sales taxes" applied at time of purchase of materials, the specific time of revenue contribution cannot be predicted.
395	Correct tables as indicated by most recent 1983 and 1984 revenue and expediture data.	The information will be corrected where appropriate in the FEIS with the newest budget data submitted. Projections for 1983 and 1984 presented in the tables were projections developed during the initial analysis. Their overall accuracy is confirmed by the information submitted, as the figures presented are within acceptable margins of error (1983 projects are within 1-2 percent of 1983 actual numbers provided).
396	The legal debt margin for Board of Public Utilities should be $2.7 million. It would be helpful to have revenues and expenditures defined.	Correct debt margin figure is noted. Definition of revenues and expenditures is found in Section 3.1.3.1 line item revenue and expenditure projections are found in Table 3.5.3-13 and Table 3.5.3-14 of the Final Socioeconomic EPTR for the City of Cheyenne Board of Public Utilities.
397	Why is there no increase in assessed valuation in Laramie County with the project? How does this alter the County's debt margin?	A small increase in the debt margin of Laramie County due to project-related increases in assessed valuation is projected. For further information, please see Section 3.5.3.3 of the Final Socioecomonic EPTR.
398	Why is not the assessed valuation of Laramie County's debt valuation higher with the project instead of equal to the no-project alternative? Does not the increased population and increased economic activity make a difference? Will not this then increase the legal debt margin?	This assessment has been revised to indicate an increase in the debt margin. For further information, see Section 3.5.3.3 of the Final Socioeconomic EPTR. The legal debt margin however need not be increased.
399	What warrants the inclusion of carryover revenue in the financial projections? Is it a new revenue source, as it is not included in the 1982 actual numbers? No explanation of what these amounts include is included in the DEIS of the Draft Socioeconomic EPTR. Is the definition of carryover - "the application of fund balance to current operations" applicable? If so, the amounts	Carryover revenue represents a surplus or contingency fund that is budgeted by jurisdictions to allow for unexpected variations in annual revenues or expenditures. It is projected that such funds will be held relatively constant over the period of this analysis. For further information, please see Section 3.5.3.3 of the Final Socioeconomic EPTR.

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	per projections should be variable and not constant as stated. These numbers need to be defined, reviewed, revised, and/or elimated based on results of operations from the previous year.	
400	Changes in state law regarding the frequent distribution of agency funds to recipient governments causes the county to experience a major reduction in interest income in fiscal year 1984. Projections indicate a reduction of $300,000 in 1984 and remain relatively constant in remaining projection years.	This change has been incorporated into the FEIS. For further information, please see Section 3.5.3.3 of the Final Socioeconomic EPTR.
401	The Proposed Action alternative provides no indication of federal funds to help mitigate the financial impact on the county. The conclusion drawn from this is that state and local government will have to provide additional revenues to finance the impact caused by the project.	A Fiscal Impact Analysis prepared by the Department of Defense Office of Economic Adjustment concurrent with the FEIS evaluates the fiscal impact upon communities directly affected by the project. This report will be used in considering impact assistance.
402	Consideration of increases in jail facility costs proposed nor the Joint Law Enforcement facility is discussed in the Public Finance Section.	The costs related to the current and proposed city-county law enforcement facility are discussed in Section 3.2.3 of the Final Jurisdictional EPTR.
403	What is meant by impact assistance? How much, for what purposes, and when will it be provided?	This refers to the Wyoming Community Impact Assistance payment from the State pursuant to W.S. Section 39-6-411 and 39-6-512. Impact funds are paid to local governments which have enacted the local 1 percent sales and use tax option based upon the increase in collections in that jurisdiction attributable to a major project. This impact assistance is expected to be provided throughout the construction phase of the project.
404	Any revenue over expenditure imbalances must be funded by unreserved, undesignated fund balance. Continuing expenditures exceeding revenues would result in cuts in services. Laramie County is required to have a balanced budget, and is not allowed to spend in excess of total available resources.	Carryover revenue represented a surplus or contingency fund that is budgeted by jurisdictions to allow for unexpected variations in annual revenues or expeditures. It is projected that such funds will be held relatively constant over the period of this analysis. For further information, please see Section 3.5.3.3 of the Final Socioeconomic EPTR.
405	The imbalance in revenues and expenditures will be funded to the extent of the unreserved,	Budgeting fund balances are expected to be utilized for their normal purpose of providing for

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	undesignated fund balance. When the fund balance is exhausted, a reduction in services will occur. Laramie County does not have the option to spend in excess of its available resources.	unexpected or extraordinary expenditures. If the project causes an imbalance between revenues and expenditures, various alternative mitigative measures will be available for more information. For further information please see Section 3.1.3.4 of the FEIS.
406	Laramie County is currently taxing to its maximum allowed and therefore no additional taxing capability exists. Increases in taxes to finance the impact of the project would place the citizens of Laramie County in the situation of paying more than their share for the project.	Increases in taxes may not necessarily result from excess project induced expenditures. The mitigations included in FEIS, with respect to tax increases, represented a wide range of alternative approaches available to offset potential fiscal impacts upon governmental jurisdictions. A Fiscal Impact Analysis prepared by the Office of Economic Adjustment (DoD), concurrent to the FEIS, evaluates the fiscal impact upon communities directly affected by the project. This report will be used in considering Impact Assistance.
407	Why should Laramie County have to delay the construction and planning for the City County Jail Facility since 1) recent federal court decisions have required other states to upgrade their facilities to federal standards and 2) delay of construction will cause the jail to cost more?	The financial plan for the city-county law enforcement facility has not yet been finalized, hence it is not yet certain whether a delay will be caused by the project. Any significant delay can be expected to increase construction costs.
408	How great an effect will increasing licences and fees have on the budget? Many limits have been set by state statutes on such a proposal.	Increased license fees will provide some increase in revenues. Short of lowering service levels or raising property tax mill levies, which is presently prohibited by statute, this is the only measure currently available. For further information, please see Section 3.5.3.3 of the Final Socioeconomic EPTR.
409	How does the purchase of materials by contractors affect the revenue picture on a local level?	For every $1 million in material purchases, approximately $20,000 in sales and use tax revenues are distributed among the county and municipalities within Laramie County. For further information, please see Section 3.5.4.3 of the Final Socioeconomic EPTR.
410	Significant budget cuts due to the project would result in reduction of services, implying that Laramie County citizens would be making sacrifices	Revenue/expenditure imbalances are the result of baseline conditions. Potential service level reductions would occur largely as the result of

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	in quality of government while paying more than their share for the system development.	non-project related decreases in state shared revenues.
411	Section 3.1.9.6 of the DEIS places responsibility for the required road improvements and maintenance on the local governments. This has not been addressed in the Public Finance section.	Road maintenance projections have been added to the FEIS. For further information, please see Section 3.1.9.4 of the FEIS.
412	Foundation funds are determined for a whole school year on the average daily membership of the previous year. Increase in enrollment after that will not generate additional monies unless the enrollment increase is 15 percent more 60 days after the start of school. This funding does not allow increases in funding from the State Foundation during the spring months when increased construction activity and related increased student enrollments are anticipated. Mitigation measures need to address this issue under the public finance section.	We have analyzed our revised projections by quarters. The projections, by year, are given for fall enrollments and are average enrollments. The peak inmigrations by year are in the third quarter, from July through September. Because the fourth quarter projections are generally lower than the average, we felt that by presenting the average figures there would be an allowance for the additional enrollments. It is safe to assume that the peak enrollments would not occur in the spring when a recalculation for the foundation funds would not be possible.
413	The cost of the Peacekeeper project on Laramie County School District No. 1 is estimated by the district to be $2,842,116 based on the DEIS.	Noted.
414	The DEIS figures show that the City of Kimball will lose roughly $10,000 in 1984 dollars from projected carryover funds during the 10-year period of construction.	This will happen only in the single peak year of 1989. In all other years, Kimball will benefit from increased revenues which result from the project. For further information, please see Section 3.1.3.4 of the FEIS.
415	Will Kimball County make or lose money on the Peacekeeper over the 10 year period? The DEIS claims Kimball County may need surplus funds but will not suffer a revenue/expenditure imbalance. The EPTR claims Kimball County will make $63,392. Who is correct?	Kimball County will remain relatively unaffected by the project except for 1989 when a temporary inmigration occurs. This will cause the use of surpluses to meet revenue expenditure imbalances.
416	Is the construction of mobile home parks, and the supplying of financial assistance by some public agency for water and recreational facilities, an adequate solution to the needs Kimball will present?	Additional mitigation measures, including the provision of temporary municipal services for trailer park residents, are explained in detail in Section 3.1.2.4 of the FEIS.
417	What of project monies will be spent in Kimball and Scotts Bluff Counties (and cities)?	No project money will be spend in Scotts Bluff County, as no silos will be altered there.

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		Expenditures in Kimball County will total $17,400,000 over the life of the project. A discussion on the distribution of project expenditures by county is in Section 2.1.3 of the Final Jurisdictional EPTR.
418	Will small businesses fold because of increased corporate franchise?	No businesses are expected to cease operations as a result of the project.
419	How can the Air Force suggest that taxes be raised to meet Public Finance shortfalls when most farmers and ranchers in this area are near economic collapse and a tax increase would bankrupt some of them?	The Air Force has not suggested that taxes be raised to meet public finance shortfalls as a mitigation measure. The mitigations included in the FEIS represent a wide range of alternative approaches available to offset potential fiscal impacts upon governmental jurisdictions. A Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, concurrent to the FEIS, evaluates the fiscal impact upon communities directly affected by the project. This report will be used in considering impact assistance.
420	Did the Air Force conduct economic base studies for a natural resource district composed of Cheyenne, Devel, and Kimball Counties, Nebraska and was an economic impact assessment completed Devel and Cheyenne Counties?	The Air Force did not conduct economic base studies for Cheyenne, Devel and Kimball Counties. While Nebraska state level economic forecasts were used, no specific assessment of Devel and Cheyenne Counties was made since no silos are to be retrofitted there and therefore no impact is expected.
421	The weekly commuter expenditure patterns will be different from that of inmigrants and current residents or inmigrants and this needs to be considered.	This is considered in the allocation of retail expenditures and indirect jobs, as well as saving patterns.
422	The DEIS does not address the private sector of the economy. Specifically, private recreational facilities are not addressed.	The economic analysis in the EIS is for all sectors of the economy. Sectors of specific importance are identified in Section 3.5.1.2 of the Final Socioeconomic EPTR. A recreation analysis including detail on most private facilities was completed for Section 10.2 of the Final Jurisdictional EPTR. The data requirements for a private sector analysis often involve release of proprietary information, and are outside the scope of an EIS.

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423	Would the project impose employment difficulties because of higher wages and the need for employees to monitor the activities of construction employees on our land?	As the local labor market will not be fully utilized with the project, it is not expected that agricultural labor productivity will be affected for the region, or for any county therein. For further information, please see Section 3.1.1.4 of the FEIS.
424	It is recommended that the Air Force utilize boomtown experts as consultants for preparation of the mitigation plan.	Noted.
425	Impacts on city services and city residents caused by the increased cost of services and the inflated cost of labor need to be addressed.	Given the small number of project-related jobs, local job openings should be filled by locally available labor without difficulty. The project is expected to pay prevailing, not premium, wages, so non-specific wage escalation will not occur.
426	Inflation is not temporary and thus more attention should be paid. Economic impact on elderly and fixed income persons from inflation is not addressed.	There will be no long term project-related impacts from inflation on the population at large. There will be a moderate degree of impact on fixed income groups and, for these persons, impact due to debts incurred may be long term. This issue is discussed fully in Section 3.1.5.4 of the FEIS. Under the Memorandum of Agreement among the Department of Defense and the states of Wyoming and Nebraska, a group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
427	The downturn impacts are understated.	As shown in Figure 3.1.1 of the FEIS there is continual growth in Laramie County and a growth/decline condition does not occur, due to the small workforce requirements of the project.
428	The EIS should address the secondary impacts and costs of the project on the area economy.	This is discussed in Section 3.1.1.4 of the FEIS. A more detailed discussion is contained in Section 3.5.1.1.3 of the Final Socioeconomic EPTR.
429	The DEIS should identify all groups and individuals that stand to lose (economically or otherwise) from Peacekeeper deployment.	The EIS identifies persons on fixed incomes as the only types of individuals or groups which might be negatively affected by the Peacekeeper deployment.

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	A compensation plan should be developed to ensure that individuals do not unfairly bear the burden of Peacekeeper deployment.	The impact on this group from project-related price increases, is expected to be minimal. All other affected persons, such as the families which might be required to relocate, will be compensated by the government directly. A fiscal impact plan will be proposed following completion of the Fiscal Impact Analysis, which is currently being prepared by the Department of Defense, Office of Economic Adjustment. For further information, please see Section 3.1.5.4 of the FEIS.
430	The EPTR and DEIS do not adequately address the bust cycles after the completion of the project.	Analysis of the period in which population declines at the end of the project has been expanded throughout the documents. The boom-bust phenomenon is not expected to be as extreme for this project as for some energy development projects in Wyoming and Colorado.
431	What is the impact of the boom and bust on the surrounding small communities?	The impact is most often a one to two-year situation, and the burden on area facilities is addressed in the relevant sections of the FEIS. The population effects on the regions smaller communities are discussed in Section 3.1.1. of the FEIS.
432	Fort Collins, only 50 miles from the Wyoming border, may be significantly affected by Peacekeeper construction, by increases in train and truck traffic, by a temporary influx of construction workers, and by a possible boom-bust economic cycle.	Because inmigrant project workers will attempt to live as close to the worksite a possible, no inmigration is expected to occur into Colorado communities which are not within 45 miles of any silo or worksite. The recent growth of retail establishments in Laramie County, Wyoming, indicates that the economic impacts due to project-related Wyoming residents shopping in Colorado will be minimal. Current Colorado residents and contractors may work over on the project due to their location, but no inmigrants are expected to desire distant commuting. Truck traffic along the Interstate Highway System is possible.
433	Financial impacts to residents and public finance in Banner County are not addressed.	This is correct; however, a Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment concurrent with the FEIS evaluates the fiscal impact upon communities

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		directly affected by the project. This report will be used in considering impact assistance.
434	The City of Cheyenne's capability to respond effectively to stress on its structures, such as water, sewer, streets and schools, will be severly hampered without justifiable financial aid and technical assistance throughout the boom and bust cycles. Specific comments will be submitted by the Mayor's Impact Team Subcommittees.	Noted.
435	Why does the Air Force tend to treat the downside economic impact (decline in project activity) as insignificant?	Table 3.1.1-8 of the FEIS shows that during the latter years of the project, normal population growth is expected to be greater than project-related out-migration, and therefore no visible downturn will occur. There will be no long term project-related impacts from inflation on the population at large. There will be an unmeasurable impact on fixed income groups. This is discussed more fully in Section 3.1.5.4 of the FEIS.
436	How would inflated rents affect the community of Kimball, and expecially those on fixed incomes?	
437	Will contractors look for housing or storage space in Dix (Kimball County)? If so, this may present a financial burden to the community.	No contractors are expected to seek storage or housing in Dix.
438	The economic impacts of the project on per capita income will not be evenly distributed, meaning some persons will prosper and some will pay.	The project is expected to have a beneficial overall effect on per capita income. It is not likely that it will be evenly distributed. Thus, some are expected to prosper more than others.
439	Can the actual formulas and the historical and background data used to project revenues be presented for each category of revenue? Also, any ratios used should be verified using constant dollars.	The actual formula procedures and historical data are presented in Section 3.1.3.1 of the Final Socioeconomic EPTR. Ratios used in the public finance section were verified and the reference cited.
440	Can estimates be made for changes in future production levels of minerals so that severance tax revenues do not remain constant over time? Can the methodology used to adjust revenue expenditures under impact conditions be described?	Subsequent to the DEIS, further analysis indicates that mineral production will parallel the projected inflation rate which means that the projected revenues remain constant in 1982 dollars. The methodology used to adjust revenues is based on tax formulas and various economic forecasts. For further information, please see

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		Section 3.1.3.3 of the Final Socioeconomic EPTR.
441	The per capita approach was apparently used for projecting cigarette and gas tax revenues. There is no evidence presented that these revenues are linked to population.	These taxes are now estimated using a time series regression equation. For further information, please see Section 3.1.3.2 of the Final Socio-economic EPTR.
442	Does the regression analysis upon which the sales and use tax projections are based take into account entities, other than individuals (regarding government, corporations), who make purchases that are subject to sales and use taxes? If so, these are not a function of personal income.	The regression analysis accounts for the sales-use tax of entities other than individuals in several ways. First, personal income includes not only wages and salaries, but farm and non-farm proprietors' income, dividends interest, rent and transfer payments. Second, the tax on purchases by government and corporations is captured in part through the multiplier effect creating induced employment and personal income.
443	Are the Federal Revenue Sharing entitlements included in the analyses beyond the three years which Congress has approved?	Yes. It is assumed that the Federal Revenue Sharing entitlements will continue through the life of the project.
444	Can evidence be presented why expenditures per household were used as the projection unit for Laramie County? Are individuals and those who live in group quarters ignored (i.e. F.E. Warren AFB)? What number of households is used per service and does it take into account that the City of Cheyenne provides water and sewer service outside its borders? Can the methods of revenue and expenditure adjustments be presented? Have weekly commuters been netted out and readded at a rate of four-sevenths? Has the need to increase water and sewer capacity 7 days a week been provided?	Expenditures per household are utilized where households are the best predictive variable (i.e., sewer and water service). Individuals who live in group quarters are factored into expenditure projections when they are allocated within a particular governmental entity's service area (i.e., sewer and water, recreation, roads). Detailed methodology is presented in Section 3.1.3.2 of the Final Socioeconomic EPTR. The need to increase water and sewer capacity and resulting expendiures has been accounted for.
445	Why do the tables on capital outlay and debt service not show differences in capital costs for the action and no-action alternatives? Will not the additional people associated with the project cause additional capital cost outlays?	Many capital facilities are being built for the no-action alternative and are not project-induced. Capital facilities and needs are documented in the Public Facilities section. Project-related population will not require capital outlays by existing agents without compensation through fiscal assistance or project generated revenue. For further information, please see Table 3.1.3-12 and Table 3.1.3-14 in the DEIS.
446	Why are not the increase in fees and license charges and the potential school district expendi-	The City of Cheyenne and Laramie County are projected to experience revenue expenditure imbal-

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	ture reductions considered negative impacts instead of mitigations? Is the proposal to have contractors make all project related purchases consistent with federal procurement regulations?	ances under baseline conditions at present spending levels. These are not project related negative impacts. Contractors may be required to make all projected related purchases consistent with federal procurement regulations.
447	There are no ad valorem taxes for sewer bonds.	Noted.
448	The Board of Public Utilities cannot levy ad valorem property taxes for sewer revenue bonds.	Noted.
449	Corrections should be made to tables presenting revenue and expenditure projections for the Baord of Public Utilities.	The figures presented in the FEIS for FY 1983-1992 are projections. Actual data is used for 1982. Accurate projections cannot be made on the basis of budgeted amounts.
450	Rate increases for the waterworks fund of the Board of Public Utilities will be implemented over a four to five-year period.	Noted.
451	Mineral royalty receipts, a source of a great deal of state funding, are down at a time when social program funding is needed most.	The issue of state funding is discussed more fully in the Public Finance sections of the EIS.

7.2.4 CONSTRUCTION RESOURCES

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452	A concern was expressed over the competition for materials.	Section 3.1.4.4 of the FEIS considers the effects of the project on locally important construction materials. Existing plant capacity within the region should easily expand to meet project demands for those materials identified in the FEIS. The only materials which are expected to be affected by competition with project requirements aggregate. New aggregate pits are expected to be opened in response to project demand.
453	A concern was expressed that project demands in combination with other construction projects will cause price increases and material shortages.	The construction resources analysis did consider problems of price increases resulting from simultaneous construction projects. Revisions noting related affects appear in Section 3.1.4.4 of the FEIS.
454	The Draft Jurisdictional EPTR does not address impacts associated with obtaining aggregate (materials) for concrete products and road surfacing, stone and clay products derived from mining and quarrying.	Impacts associated with obtaining construction materials are discussed in Section 3.1.4 of the FEIS. Competition for aggregate as part of asphalt requirements will require the opening of new gravel pits.
455	Project impact on ready-mix and its impacts on city residents and city services should be addressed.	Section 3.1.4.4.1.2 of the DEIS addresses project impact on hydraulic cement production. These impacts are considered low short-term and not significant. Impacts on the ready-mix concrete producers who combine cement with other ingredients were not addressed directly. The construction resources analysis does suggest that project contractors utilize portable batch plants to reduce noise, dust, and air pollution. This measure would also ensure existing ready-mix plants would not be overburdened by project demands.
456	Concern regarding the availability of materials (sand and gravel) for city residents and city services.	It is anticipated that moderate short-term impacts may occur in 1986 if the worst-case scenario for road upgrading is accomplished. However, sand and gravel will still be available for use by city services. No long-term impacts are anticipated in the area of aggregate supply. For further information, please see Section 3.1.4.4.2 of the FEIS.
457	A concern was expressed over the use of cumulative state data to estimate project demand on regional	The analysis has been revised to consider the impacts of project demand on the production of

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	consumption of aggregate.	aggregate. Data that reflect regional production levels have been incorporated and assess project impacts on aggregate producers within the Region of Influence. A discussion of aggregate reserves within the Region of Influence is also included. For further information, please see Sections 3.1.4.4.2 and 3.2.3.4.1 of the FEIS.
458	Comment endorsing recommended mitigation measure involving project contractor purchase of local materials rather that through the Department of Defense.	Noted.
459	A concern was expressed over the availability of construction materials. It is felt that local small scale purchasers will be outbid by large purchasers.	The construction resources analysis dealt with the identification of locally important construction materials. These materials were identified by location quotients. Locally produced materials supply is sufficient. No market distribution problems are foreseen. Local producers can easily expand plant production to meet project demand. For further information, please see Section 3.1.4.4 of the FEIS.

7.2.5 SOCIAL WELL-BEING

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460	Local quality of life is being given superficial treatment and low priority. Under the DEIS level of impact definitions for social well-being, no social impacts can be defined as high.	Level of impact definitions for social well-being are a result of extensive analysis of social well-being criteria and discussions with social well-being experts. High levels of impact are possible when specific impact related criteria are met. For further information, please see Section 3.1.5.2 of the FEIS.
461	Areas of Concentrated Study and Region of Influence should be the same as population inmigration is not the only factor influencing social well-being.	Population inmigration, though not the only factor influencing social well-being, was considered the most reliable means of determining which areas would be affected most by the project. Areas of Concentrated Study were designated based on the approximately five percent inmigration impact outlined in the EIS.
462	Newcomers may have difficulty assimilating into a small rural community because of limited social, entertainment and recreational opportunities.	The assimilation and integration of newcomers, especially those in the 15 to 34 age cohort, is discussed, along with mitigation measures Recommendations have been made to minimize these effects. Please see Section 3.7.5 of the FEIS.
463	The Scottsbluff/Gering area was not included as an area of study because the population increase would be less than five percent. The services being provided, however, will be seriously impacted even though the population increase will be in Kimball and Cheyenne Counties because, as the DEIS states, people will have to travel or do without certain services.	In addition to population increase, the availability of housing and levels of public service provision were considered in defining the Areas of Concentrated Study. Although Gering/Scottsbluff is in the Region of Influence of the project, the anticipated impact was not considered great enough for the area to be defined as part of the Area of Concentrated Study.
464	How will mitigation measures for impacts to social well-being be funded?	Until the exact mitigation program has been determined by the responsible agencies, funding sources cannot be determined.
465	Substantial impacts in alcoholism can be expected in Cheyenne when construction workers begin to file into the city. Statistics indicate that 70 percent of all violent crimes and 68 percent of all murders can be attributed to alcohol use.	The DEIS acknowledges that the relative number of alcohol-related incidents, including disturbances of the peace and family violence, is likely to increase. Text revisions were made to reflect the relationship between violent crimes and alcoholism. For additional information on anticipated crime increases and mitigation measures, please refer to Section 3.1.5.6 of the FEIS.

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466	Impact levels are not satisfactorily defined with respect to high impact definitions.	Level of impact definitions for social well-being are a result of extensive analyses of social well-being criteria and discussions with social well-being experts. High levels of impact are assigned when specific project related impact criteria are met. These are discussed in detail in Section 3.1.5.2 of the FEIS.
467	Neither local policy nor the Air Force impact studies demonstrate adequate concern with well-being issues.	Social well-being issues were extensively analyzed by social well-being experts. Community impacts and mitigation measures were reassessed and expanded, and are discussed in Section 3.1.5 of the FEIS.
468	It is wrong to assume that unsuccessful people will outmigrate when the project is over (e.g., families which will be seeking some stability).	On the basis of information provided by the State Employment Security Administration, unsuccessful job-seekers are considered to remain in the area for a short period of time, and there is ongoing turnover of persons. As the project construction finishes, and jobs are no longer available, this turnover is no longer expected.
469	We hope the Air Force will not assume potential "benefits" to social well-being will outweigh some of the project's adverse efforts.	The FEIS does not conclude benefits will outweigh adverse impacts. Both adverse and beneficial impacts are discussed, as well as mitigation measures. Affected communities are encouraged to consider mitigation measures carefully as a means of enhancing both present and future social well-being. Please see Section 3.1.5.6 of the FEIS.
470	How many social well-being interviews were done? Who processed them?	Approximately 60 social well-being interviews, including discussions with Human Service Agencies, were conducted over a period of several months and processed by professionals responsible for the preparation of the FEIS. Residents, officials, and planning group members of Laramie, Kimball, and Platte County supplied information on certain County-supplied information on certain community characteristics and needs.
471	What are the short and long-term impacts? What are the potential beneficial effects? What do these impact level terms mean?	Short-term impacts are impacts which do not exceed the duration of construction activity. Long-term impacts would therefore be expected to extend be-

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		yond this period. For a discussion of levels of impact, please see Section 3.1.5.2 of the FEIS.
472	Level of Service provisions for mitigation measures four and nine are not clear.	Mitigation measures were reassessed and expanded to include suggestions on timing, effectiveness, and agencies potentially able to implement them. Revisions have been incorporated in Section 3.1.5.6 of the FEIS.
473	The mitigation measure suggesting transportation for intoxicated patrons is not a serious mitigation. Service would have to be paid for by users and of a voluntary nature.	Mitigation measures are being reassessed and expanded to include suggestions on timing, effectiveness and agencies potentially able to implement them. Revisions will appear in Section 3.1.5.6 of the FEIS.
474	A Human Services Council could be formed to coordinate the human service delivery system in Cheyenne and to mastermind the execution of the planning.	Noted.
475	A Human Services Council should be developed to coordinate human service delivery throughout the Peacekeeper project boom cycle and to plan for the bust cycle.	Noted.
476	A mechanism is needed to coordinate the various community services available throughout the City of Cheyenne. An Information Coordination Center could be established through a Human Services Council.	Noted.
477	The schools and media could provide prevention education relating to alcohol and drug abuse and family violence, as suggested in mitigation number three.	Mitigation measures were reassessed and expanded to include suggestions on timing, effectiveness, and agencies potentially able to implement them. This suggestion has been given further consideration, and revised mitigations appear in Section 3.1.5.6 of the FEIS.
478	Better analysis of qualitative social well-being measures, including psychological impacts on the general public and relocated families who must regularly travel on roads in the danger zone.	Noted.
479	The last several paragraphs of the summary in Chapter 2 of the DEIS do not clearly summarize the	Short-term impacts are defined for project analysis as those occurring during the

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	social context of the affected area.	construction period. Accordingly, long-term impacts are those which coincide with the operations period. Social Well-Being impacts are measured in terms of community changes, (real and perceived) as expressed in local issues, and their organizational responses. Impact effects are judged in terms of their levels (negligible, low, moderate, and high rankings), and according to whether these effects are adverse or beneficial. The impact terms are used to qualify the impact discussion in the analysis for a comprehensive understanding of social well-being effects. For details on specific impacts by jurisdictions affected, please see Section 3.1.5.5 of the FEIS.
480	No assessment of the impact upon present day culture of the Hispanic and Caucasian inhabitants of the Region of Influence was included in the DEIS.	The social well-being section of the EIS examined population characteristics of the inhabitants of the Region of Influence in Section 2.1.5. Ethnicity, as well as other population characteristics (age, sex, economic characteristics, vital statistics, etc.) were summarized by county followed by a general discussion of selected attributes and subelements of the existing social structure. A detailed assessment of the intangible aspects of culture, however, is not a NEPA requirement and was considered outside the scope of the EIS.
481	More attention should be paid to the following problems of rural subdivisions: water quantity and quality, sewage, refuse, land values, cost of transporting school children, conflict between agricultural production and the rural subdivision resident.	Inmigrant workers and families are allocated to communities rather than rural areas with low population density. Since rural subdivisions are not expected to receive substantial inmigrant populations, they are not given extensive treatment within the final analysis.
482	The document is devoid of discussion on the impact of the project on the rural lifestyle in Banner and Kimball counties.	The Social Well-Being sections of the FEIS and the Final Socioeconomics EPTR address the issues of lifestyle impacts of the project.
483	It is repugnant to suggest that spirit and effort used to conduct Frontier Days can be transferred to planning for and dealing with such project impacts as adverse psychological and social phenomena.	Noted.

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484	The study presents very little information on how current residents would be impacted other than by the availability of housing in the Wyoming and Nebraska communities.	The Final Jurisdictional EPTR analyzes a wide range of impacts on current residents including such issues as employment, education, police and fire protection, and recreation.
485	Social well-being high impact definitions do not correspond to the normal section of meaning of high impact. This results in a Catch-22 which precludes any impacts from being high. Numbers of transients expected in the Cheyenne area are unprecedented and should be a high impact even if the definition is not changed. Regarding short and long term impacts, social well-being impacts cannot be confined to short term because indigents will stay on, previously employed persons will become unemployed and stay, and social alienation will probably rise.	Level of impact definitions for social well-being are a result of extensive analysis of social well-being criteria and discussions with social well-being experts. High levels of impact are assigned when specific project level criteria are met. Transient impact levels have been reassessed in the final analysis.
486	The DEIS states that social alienation will increase but the ratio of social problems will be stable. This does not follow; alienated people will have social problems.	The DEIS reference to increased social alienation refers to a numerical increase. The ratio of social problems is expected to remain stable because population increases and social problem increases are expected to increase proportionally.
487	The DEIS assumes there will be no long-term impacts from inflation. This appears to be incorrect; prices are not likely to go down and low, fixed income persons are likely to have to maintain debts incurred during the inflationary period.	There will be no long-term project-related impacts from inflation on the population at large. There will be a moderate degree of impact on fixed income groups, and for these persons, impact due to debts incurred may be long term. This issue is discussed more fully in Section 3.1.5.4 of the FEIS.
488	Disagree that increased taxes will enable the community to provide more services. Once levels of service are in place and expectations are established, what will happen when services cannot continue to be provided?	Tax increases have not been suggested as a mitigation measure. Given the nature of baseline population growth relative to project growth, as shown in Figure 3.1.1-1 of the FEIS, the need for service reductions will not occur.
489	The DEIS states there will be some benefits to social well-being from the project. We certainly hope you will not conclude that benefits will outweigh adverse impacts.	The FEIS does not conclude that benefits will outweigh adverse impacts. Both the adverse and beneficial impacts are discussed in Section 3.1.5.4, as well as mitigation suggestions. The affected communities are encouraged to consider

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		mitigation measures carefully as a means of enhancing both present and future social well-being.
490	The term 'social well-being' is probably a little esoteric. Most of us are accustomed to our existing community lives and any impact will be noticeable. The project will, no doubt, cause mental and physical hardships.	Social well-being impacts, as discussed in Section 3.1.5.4 of the DEIS, identify potential mental and physical hardships. These impacts were reassessed and discussed more fully in the final analysis. Suggestions to minimize potential adverse impacts have been provided.
491	The DEIS concludes that the project presents the opportunity for innovative planning for the community. The FEIS needs to explain how this can happen.	The assessment of the project as an opportunity for innovative community planning is one which must be made by local authorities based on the information presented in the FEIS regarding potential changes, and the commitment to use every means available to enhance community well-being in the future.
492	With regard to mitigation, we need some assurance that mitigation measures will take place in time.	Please see Section 1.3.8 of the FEIS.
493	The issue of a declining pool of volunteers due to increased employment must be addressed. The use of volunteers may not be a viable mitigation alternative.	The use of volunteers and voluntary organizations to mitigate the impacts from the project is only one of several alternatives considered. In most cases, more than one type of organization is identified as potentially able to carry out the suggested mitigation.
494	Kimball County has a higher than average number of persons living below the poverty level, and the DEIS does not adequately address the impact on these persons.	Revisions dealing with this issue have been made. Please refer to Section 3.1.5.4 of the FEIS.
495	The DEIS concludes that although a population increase of at least 5 percent is projected for Kimball County during at least one year of the project, no major structural changes in the area's social make-up are anticipated. An explanation for this presumptively inconsistent conclusion is needed.	Population influx was the criteria used to define the Area of Concentrated Study for the social well-being section of the EIS. However, a 5 percent increase does not of itself produce major structural changes in social well-being. Level of impact definitions and a discussion of impact levels for Kimball County are covered in Section 3.1.5 of the FEIS.
496	Inconsistency exists between the social services and social well-being levels of impact for Kimball	Revisions for consistency have been included in the final documents.

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	County in the DEIS.	
497	A better and more complete analysis of the nature and potential needs of transient unskilled job seekers is needed.	The profile and service-related needs of transients were reassessed in order to provide a more accurate profile of their numbers and needs. Please see Sections 3.1.5.4 and 3.1.6.4 of the FEIS.
498	Is the influx of job-seekers really as manageable as the DEIS suggests or will large numbers of job-seekers be drawn into the area?	Although surplus job-seekers will have a moderate impact on the affected communities, the problem was considered manageable and mitigations are suggested in Section 3.1.5.6 of the FEIS. Surplus job-seekers have been discussed in Section 3.1.5 of the FEIS.
499	Negligent transients who trespass on private lands could spoil the workable relationship outdoor enthusiasts have with rural property owners.	Noted.
500	The Wyoming Division of Public Assistance and Social Services representatives have found only 50 percent of transient applicants to the Wyoming Job Service are sincere in their search for employment. The other 50 percent are using the system to secure free food, shelter, and transportation before they move on.	A media program to discourage surplus job-seekers is one of the mitigation measures suggested to minimize the impact of transients. This, and other transient-related mitigation measures, have been discussed. For further information, please see Section 3.1.5.6 of the FEIS.
501	The seriousness and long term effects of the transient impact is not being adequately recognized. Cheyenne has had a 300 percent increase in transients over the past year and is expecting at least 1,000 person increase within the next year. A human services mitigation fund to meet urgent needs is needed to allow the community to cope with change without overfunding some services and short changing others.	Transient impacts on the Areas of Concentrated Study have been reassessed. For further information, please see Section 3.1.6.6 of the FEIS.

7.2.6 PUBLIC SERVICES AND FACILITIES

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502	Impacts of population inmigration may be greater than the population increase alone, and may lead to disproportionate problems for law enforcement and human services.	The potential for disproportionate impacts on services from the inmigrant population is taken into consideration in the revised projections for impact analysis on police and human services. A multiplier was applied to the inmigrant population numbers, and a range of possible impacts presented, to account for this possibility. Sections 3.5.2.9 and 3.5.2.10 of the Final Public Services and Facilities EPTR address potential disproportional impacts on law enforcement. Section 3.5.6.4 of the Final Public Services and Facilities EPTR presents a range of anticipated impacts on human services.
503	A list of additional mitigation finance measures is suggested by Laramie County School District No. 1.	The School District's measures were considered in the development of mitigation measures presented in the FEIS. A revised and expanded list of mitigation measures can be found in Section 3.8.1.4 of the Final Jurisdictional EPTR and in Section 3.7.1 of the Final Public Services and Facilities EPTR.
504	Assurance is needed that victims of domestic violence resulting from the project will receive assistance.	The Community Center on Domestic Violence and Grandma's Safe House are two Cheyenne organizations which provide assistance to victims of domestic violence. Domestic violence and family problems were priority impact issues considered in the analysis of needs for human services. The agency's current unmet need for space and potential disproportionate impacts from the inmigrant population were taken into account by utilization of an impact population multiplier to assess impacts on the agency. Mitigation measures presented include renovation of the basement to add space to house victims, additions to staff, and a monitoring program. Section 3.10.1 of the Final Jurisdictional EPTR and Table 3.5.6-2 of the Final Public Services and Facilities EPTR provide detailed impact projections.
505	Increases in vandalism and theft are a concern in remote areas and these were not adequately addressed in the DEIS.	Some increases in vandalism and theft are likely to occur in remote areas as a result of the project. These were considered, though not explicitly

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		stated, when preparing the DEIS. Revisions have been made to reflect these concerns. Mitigations, including adding personnel to the Laramie County Sheriff's Department, are presented in Section 3.1.6.6.2 of the FEIS.
506	The report proposed mitigations of additional vehicles and equipment for the City of Cheyenne, which will have an impact on the Fleet Maintenance Division of the Public Works Department. More staff and space will be needed to maintain vehicles.	Since increased vehicles and equipment for the various departments are mainly accelerations of baseline needs, the city maintenance response would parallel equipment acquisition and use accelerations. While more staff would be required, off-hour use of space should prove adequate to meet increased needs. If not, private maintenance contracts with local businesses would alleviate the need for additional space.
507	The mitigation measures presented indicate needs for construction of new facilities to alleviate impacts on existing facilities which are not adequate to serve the projected immigrant population. It is time to put money into these projects rather than into further environmental studies.	Please see Section 1.7 of the FEIS.
508	The criteria for assessment of governmental jurisdictions with projected population increase of five percent or over is arbitrary. Other cities and towns in Nebraska are in fact in the Region of Influence and should be included.	The application of the five percent level as the threshold for determining the Area of Concentrated Study is based on research into communities' abilities to absorb growth caused by the Department of Defense and energy projects. The 1975 Gilmore and Duff study of Rock Springs, Wyoming (Denver Research Institute) first identified the rule of thumb that a five-percent population growth rate "is about all that a small community can absorb." Research done by the President's Economic Adjustment Committee in the 1981 Community Impact Assistance Study suggests a more stringent guideline:"...tax burdens in communities with fewer than 5,000 residents begin to rise at growth rates in excess of seven percent, and continue to rise even more rapidly as growth rates increase. In larger jurisdictions, tax burdens do not substantially exceed average levels until annual growth rates are at least ten to twelve percent."
509	Conclusions regarding impacts on education, law enforcement, criminal justice, fire protection,	The analyses of public service impacts were based on detailed research and statistical projections,

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	health care, human services and libraries in Kimball lack a scientific basis	as described in the methodologies contained in Appendix A of the Final Jurisdictional EPTR and Sections 2.5 and 3.1 of the Final Public Services and Facilities EPTR.
510	Impacts of and mitigation measures for alcohol abuse by commuters, transients and job seekers were not provided	More detailed and specific mitigation measures for social service impacts of special population groups such as transients have been developed and are presented in Section 3.1.6.6.6 of the FEIS, Section 3.10.1.4 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
511	Impact on law enforcement was rated significant due to impact on public safety. Why were impacts on fire protection not also rated significant, as these also affect public safety?	The significance criteria, as applied to law enforcement, took two factors into consideration; controversy and public safety. Due to the potential for demonstrations, the controversy factor was triggered. Public safety concerns are related to the potential for disproportional increases in traffic accidents. Subsequent analysis showed that the public safety issue concerning traffic accidents is not as great as described in the DEIS. However, the potential for demonstrations and related controversy would trigger the significance rating. While fire protection impacts also affect public safety, it is not anticipated to be affected any more than increased demands associated with normal population growth.
512	It is not clear what is meant by the statement that the operation of human services at capacity or below standards is indicative of an unmet need for additional community support	If additional support for human services were available in the community, the services would be upgraded; it is a local decision to support agencies at a given level. The FEIS and Final Public Services and Facilities EPTR provide more detail on unmet needs in the community as well as disproportionate needs created by the impact inmigration population. Please see Section 3.5.6.4 of the Final Public Services EPTR.
513	The mitigation measures proposed for impact on human services are considered important. Will they be implemented only by human service professionals, or also by interested citizens?	The mitigations presented are intended to be open to input and assistance in implementation by any interested persons, as well as the agency professionals. Volunteer participation would be welcomed by the agencies responsible for

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		implementation of these measures.
5:4	The DEIS did not discuss the effects of annexations of surrounding urban areas on the capabilities of the City of Cheyenne. Annexations would change the mix of available public services.	It is not possible to project future annexations, though the potential for these actions has been recognized. Actual annexation would be a political decision, and is therefore not analyzed. The analysis of public services and facilities evaluated existing agencies operating within existing governmental jurisdictions.
5:5	How much money does the federal government give per child for military dependents?	PL 874 federal legislation provides for dependents of military personnel to attend public schools. The entitlement per student was $1,084 in 1982. Actual allocations may be less depending on Congressional budgetary appropriations.
5:6	No enrollment increases due to the project have been indicated before 1985. The accuracy of this is questioned, taking into account the unemployed immigrants that arrive due to the presidential announcement of location and the actual construction schedule for road construction.	Upon subsequent analysis, given additional data and developments, 68 project-related students have been projected for the average public school enrollment in 1984.
5:7	A large numbers of students may enroll after the beginning of a school year. The impact of this constant interruption to the classroom and school needs to be addressed. Additional staff may be needed to establish placement in special programs if students do not bring their past records.	It is recognized that there will be logistical problems in processing new students that come into the district as a result of the project. The possibility of teacher "burnout" or attitudinal problems has also been considered. Additional staff for special education programs are possible. Please see Section 3.8.1.3 of the Final Jurisdictional EPTR and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
5:8	Continuation of student arrival will greatly affect Laramie County's school bus routes, as bus capacities are exceeded and new routes may need to be established or changed during the year. Mitigation measures should address the busing problem.	Projections under impact conditions include "worst-case" busing needs. Busing needs were calculated by assuming that 60-percent of the impact inmigration students would require busing. This compares with 1982 when approximately 40-percent of students were bused. Measures to mitigate impacts on school transportation are presented in Section 3.8.1.4 of the Final Jurisdictional EPTR and Section 3.7.1 of the Final Public Services and Facilities EPTR.
5:9	Laramie County School District No. 1's food service has increased its meals substantially in	A section on food services has been added and the need to reorganize two of the four central food

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	the past two years and is near its capacity in the preparation kitchens. Mitigation measures should address the impact on our food service.	service kitchens is recognized in baseline conditions. Presently, 44 percent of the elementary students and 30 percent of the secondary students take advantage of the school lunch program. Under impact conditions, during the peak year in 1987, this would translate into 145 elementary students and 84 secondary students, using the school lunch program. This daily increase dispersed throughout the 23 elementary schools (by 1987 Anderson Elementary will be operational) and the five secondary schools, will represent a minimal increased burden on the preparation kitchens and the satellite service areas so as not to require special mitigation measures for food services.
520	Student enrollment increases should not only include those that are a direct result of the Peacekeeper project, but also those that are generated because of project-related projects. The enrollment impact of any population increase due to construction at F.E. Warren AFB should also be included as these areas are for support of the mission. Mitigation measures should address these 'project-related' increases.	The baseline population projections for the City of Cheyenne incorporated the construction work-force for F.E. Warren AFB construction projects. The baseline future-no action discussion of School District No. 1 includes enrollment projections based on this population forecast. Section 3.1.6.6.1 of the FEIS presents a selection of mitigative measures.
521	A review of possible public or private uses of Johnson Junior High School has not been adequately addressed through the potential mitigation measures in areas such as public health, park and recreation, housing, etc. Request that the potential uses of the school be appropriately listed in other mitigation measures.	The list of possible uses for old Johnson Junior High School has been supplemented. Potential uses for the facility include renovation for use as a transient shelter or an impact coordination office. For further information, please see Section 3.1.6.6 of the FEIS and Appendix D of the Final Jurisdictional EPTR.
522	The general residential locations of the students generated by the project and related projects should be identified.	The neighborhood locations of the inmigrant population have been aggregated into cluster boundaries. There are 4 clusters in School District No. 1 within which students can be bused to effectively utilize space. For further information, please see Section 3.8.1.3 of the Final Jurisdictional EPTR and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
523	The impact of the Presidential Commission on Excellence in Education should be reviewed.	The potential impact of this report was reviewed under the baseline future scenario. Wyoming's

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		response to the Presidential Commission on Excellence in Education is the Blue Ribbon Commission on Education. Laramie County School District No. 1 also has a committee working on a response to the Presidential Commission. The results of the three committees and how they affect the curriculum, calendar, or philosophy of Laramie County School District No.1 is a function of internal district planning and policy. There are no mandates associated with the Commission on Excellence in Education, only recommendations.
524	The statement that Laramie County's new elementary schools are "state-of-the-art" is not quite accurate. They were based on 1982 education curriculum and changes have been made to require some modifications already, even before they have opened.	The EIS analysis is based on 1982 enrollments, staffing, and education facilities. In 1982, the designs for Anderson Elementary and Gilchrist Elementary schools were state-of-the-art facilities, i.e., these schools are used as facility standards by the school district.
525	The possible need to expand the North Central school schedule on the secondary level to accommodate additional students does not address the changes in busing, after-school jobs, the hiring of additional staff, and requirements of school certification itself. The mitigation measures should also include the limitation set forth in certification standards on the number of instructional periods and preparation periods. The impact of part-time staffing should also be addressed.	Presently both Central High School and East High School have a 7 a.m. - 7:55 a.m. first period; because of the existing busing schedules it is underutilized. The mitigation measure suggesting an expansion of the number of periods offered in the high schools would require a revision of the busing schedules to ensure that the high school students would get to school in time for first period. This may require a later school day for the secondary schools or an earlier school day for the elementary schools. It is not possible to analyze the potential effect on students' after school activities such as jobs. The certification standards would be retained as they presently exist. More staff members could preserve the two daily preparation periods as is the current policy. The hiring of part-time staff would be a District decision. It was not mentioned as a necessity, but rather as a possibility.
526	Estimates of a decrease in high school enrollments while projecting increased population in Kimball seems an unlikely conclusion.	The Nebraska State Department of Education uses an enrollment projection model that is influenced by numbers of births. Because birth rates were lower in the sixties, which affects the high school enrollments in the eighties, the high school enrollments are projected to decrease. In

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		applying projection models, high school enrollments are indirectly a function of birth rates 14 to 17 years prior. Because of the projected increased population in Kimball, high school enrollments should begin to increase in the nineties.
527	The DEIS fails to adequately address the impacts to School District No. 2 in that a greater level of impact should be anticipated	The FEIS, Final Jurisdictional EPTR, and Final Public Services and Facilities EPTR include more detailed analysis of impacts on Laramie County School District No. 2. For further information, please see Section 3.1.6.4.1 in the FEIS, Section 3.8.2.3 of the Jurisdictional EPTR, and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
528	The data on law enforcement services and potential impacts of them was interesting	Noted.
529	Surplus job-seekers associated with project-induced population increases projected for Kimball will adversely affect law enforcement and volunteer agencies with a major impact upon their available resources	The need for the addition of one police officer in the City of Kimball and one additional staff for the County Department of Social Services is projected to alleviate project impacts on law enforcement and human services. The projections of potential impacts due to the population of job-seekers in Kimball has been addressed. For further information, please see Sections 7.7.1.3 and 7.1.2.3 of the Final Jurisdictional EPTR and Sections 3.5.2.15, 3.5.2.16, and 3.5.6.6 of the Final Public Services and Facilities EPTR.
530	The minimum space allocation for the City of Cheyenne Police Department should be 18,000 square feet rather than 14,500 square feet as used in the report	The FEIS contains a projection of more space to be allocated to the City of Cheyenne Police Department and Laramie County Sheriff's Department based on more refined architectural standards. For further information, please see Section 3.1.6.4.2.8 of the FEIS and Section 3.2.6.3 of the Final Jurisdictional EPTR and Section 3.5.2.9 of the Final Public Services and Facilities EPTR.
531	The DEIS does not address available state law enforcement capability in Nebraska	The incremental increase in population is not large enough to warrant additional staffing or equipment for state law enforcement.
532	The project related impacts upon traffic and public safety will require the provision of	Generally speaking, project-related law enforcement impacts were projected on the basis of

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	additional law enforcement personnel for Banner County to be paid by local taxpayers. The DEIS fails to adequately consider such impacts	changes in residential population. Since no change in population is forecast for Banner County, no law enforcement impacts were projected. In the case of Banner County, additional consideration was given to the possibility of impacts due to persons travelling to or through the county to project-related work sites. As is discussed in the FEIS, the worst-case scenario projects a possible 25-percent increase in traffic accidents in the county. This would require about one day per month additional time by the Banner County Sheriff. This increase is not of sufficient size to require any additional law enforcement personnel, even on a part-time basis, especially when taking into account the fact that the Nebraska State Patrol investigates most accidents on state highways in the county. This is not to say a 25-percent increase in accidents in Banner County was projected. Such an increase is the worst-case scenario used only for looking at possible additional demands on the Sheriff's Department.
533	The DEIS section on the Laramie County Court understates the court's caseload, and the support staff. The court's backlog as well as the number of dispositions by forfeiture and guilty plea relative to total dispositions are overstated.	The DEIS studied only the court's criminal docket. An analysis of both the criminal and civil dockets has since been conducted. Additional analysis and consultation with court personnel disclosed that the backlog is frictional in nature and that the court is handling its caseload without delay. For further information, please see Section 2.1.6.2.3 of the FEIS, Section 3.1.3.1 of the Final Jurisdictional EPTR, and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
534	If the impact on the judicial system is not major, the judicial system can accommodate it without any change in its present capacity. However, if a major impact does occur, it will require additions to court staff and facilities.	For those jurisdictions projected to receive relatively high population inmigration, impacts requiring additions to staff, courtroom and office space have been described. For those jurisdictions to receive little population inmigration, whether in relative or absolute terms, no such impacts were found. For further information, please see Section 3.1.6.4.3.6 of the FEIS and Section 3.1.3.3 of the Final Jurisdictional EPTR, and Section 3.5.3.8 of the Final Public Services and

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		Facilities EPTR.
535	The City of Cheyenne Police Chief disagrees with projected numbers of law enforcement personnel required by project impact.	In order to accommodate the concern over a potential for disproportional demand on law enforcement services and the subsequent number of personnel necessary to maintain existing service levels, a sensitivity range was developed. The low end of the range represents proportional increases while the upper end of the range represents disproportional increases. See Section 3.1.6.4.2.9 of the FEIS and Section 3.2.6.3 of the Final Jurisdictional EPTR and Section 3.5.2.10 of the Final Public Services and Facilities EPTR.
536	Laramie County Fire District No. 2 will be expected to respond to emergencies at silos, though they have only one emergency vehicle. The District should be provided with funds for another emergency vehicle.	Responsibility for emergency services at the silo sites will be clarified by the U.S. Air Force. Based on population projections for the District's service area, including the workforce as a population at risk subgroup, no additional vehicles will be required.
537	The DEIS does not discuss areas that are not in organized fire districts. A population increase in these areas could result in damage to life and property.	Project-related population increases are not projected for any areas that are not in organized fire districts.
538	Do considerations of health care within the Public Services section of the DEIS include mental and emotional health?	Considerations of health care did not include mental and emotional health; issues of mental and emotional health are addressed in Section 3.1.6.4.6 of the FEIS and Section 3.10.1 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
539	The ability of health care facilities to treat nuclear war victims should be addressed.	Please see Section 1.3.3 of the FEIS.
540	Existing health care facilities and manpower in Laramie County are operating at capacity. Any increased population will stretch these services.	Impact analysis on the health care system indicates the potential need for additional staff and facilities. For further information, please see Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
541	The DEIS correctly identified need to expand the obstetrics unit of County Memorial Hospital as	Expansion of the obstetrics unit would entail only a transfer of existing beds. The total capacity of

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	an acceleration of baseline service demand growth. However, such an acceleration in service development results in lost opportunity costs, and delay of other services which may have been expanded instead.	beds in the local hospital is ample to accommodate the impact population. No new construction would be required. Therefore, no "opportunity costs" would be lost.
542	How will medical accidents be handled at remote locations such as the silo sites?	Capabilities for handling accidents at remote locations have been addressed in the final analysis. Health care mitigations presented have been expanded to include the proposed addition of one or more persons with basic emergency care training. For further information, please see Sections 3.10.2.3 and 3.10.2.4 of the Final Jurisdictional EPTR and Sections 3.5.5.4 and 3.7.5 of the Final Public Services and Facilities EPTR.
543	Additional information on the Laramie County-Cheyenne City Health Unit staffing under existing conditions is provided, and a revised staff to population ratio for use in projections is suggested.	Additional information provided has been taken into consideration and incorporated where appropriate. The 24.5 staffing level suggested has been applied to baseline population forecasts and impact population projections through 1992. Overall impacts are rated moderate and significant, as the Health Unit, though it will be further strained due to the project population influx, is currently inadequate in both staff and facilities and would remain so under baseline future, without project conditions.
544	The proposed mitigation to establish a satellite health clinic will create problems unless more specific planning is included for appropriate direction and responsibilities of the clinic and its staff. This clinic should be under the direction of Nursing Services, Laramie County-Cheyenne City Health Unit.	The mitigative measure presented in the draft reports of establishing a satellite clinic has been modified to place the proposed clinic under the direction of the Laramie County-Cheyenne City Health Unit. This clinic would be a stopgap measure which would not be adequate to mitigate the need for a larger, more adequately staffed Public Health Department. If the Laramie County-Cheyenne City Health Unit were relocated to a larger facility, the satellite clinic would not be necessary.
545	Treatment of Laramie County health care facilities and manpower does not consider total impact of inmigration into the area.	The impact of inmigration on health care will be greatest at the Laramie County-Cheyenne City Health Unit, where manpower, facilities and services are strained due to existing inadequacies. A more detailed analysis of impacts

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		on Laramie County health care facilities and manpower is contained in Section 3.10.2.3 of the Final Jurisdictional EPTR and Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
546	There is doubt about the ability of city/county public health personnel and facilities to deal with problems of large itinerant population, as staff and facilities are currently overtaxed.	The project impacts on the Laramie County-Cheyenne City Health Unit are discussed in more detail in the Final Public Services and Facilities EPTR. Additional information and analysis, particularly on problems associated with transient populations, is provided. For further information, please see Section 3.10.2.3 of the Final Jurisdictional EPTR and Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
547	Existing nursing homes in Cheyenne are at capacity, and workers may bring elderly dependents with them.	According to inmigrant population projections by age cohort, a negligible number of persons over age 50 may be included in the inmigrant population. Though nursing homes in Cheyenne are now at capacity, a new home has been proposed for construction which would alleviate the current condition.
548	Reference in the DEIS concerning private medical clinics is confusing and inaccurate.	The analysis of health care facilities and personnel concentrated on impacts of public providers, rather than on private care which can and does expand to meet market demand. Indications from the Laramie County Health Planning Committee are that private health facilities have adequate capacity to serve the additional population.
549	The Wyoming Department of Health and Social Services submits comments containing additional information on health and social services programs and funding, and suggestions to improve planning for impact. The Wyoming Office of Planning and Administration offers assistance to local offices for project participation.	Information contained in this letter has been taken into consideration in the analysis. For further information, please see Section 3.10.1 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
550	The availability of qualified obstetric care in the Cheyenne area is not correctly stated in the DEIS. Obstetric beds and delivery rooms at Laramie County Memorial Hospital are limited and have often been filled to capacity.	The obstetric unit at Laramie County Memorial Hospital averages on an annual basis 80 percent occupancy. With this average level of use, there are occasions when the unit is at capacity. The hospital has developed means of dealing with this

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		occasional situation. The Hospital Administrator has stated that expansion of the unit is not needed to meet current needs. In addition, projections by the Wyoming State Department of Health indicate that due to falling birth rates, no more obstetric beds will be needed at the hospital in 1990 than presently exist.
551	Human service agencies in the City of Cheyenne and Laramie County will be overwhelmed by the influx of project-induced population. Provision should be made for adequate mitigation given the anticipated level of impact.	Mitigative measures and strategies to deal with impacts of human service agencies have been revised in the final documents. For further information, please see Section 3.1.6.6.6 of the FEIS, Section 3.10.1.8 in the Final Jurisdictional EPTR, and Section 3.7.6 of the Final Public Services and Facilities EPTR.
552	What will be the social service needs of unsuccessful job-seekers in Nebraska?	One additional staff person is projected for the Kimball County Department of Social Services due to project inmigration. Increased demands on human service agencies due to the influx of job-seekers are addressed in the FEIS and Final Public Services and Facilities EPTR. For further information, please see Sections 3.5.6.6 and 3.7.6 of the Final Public Services and Facilities EPTR.
553	A permanent, ongoing monitoring system must be instituted to continuously monitor the changing needs of Cheyenne's social service agencies.	The institution of a monitoring program was a mitigation presented in the DEIS and Draft Public Services and Facilities EPTR. More detailed mitigations are presented in the Final documents. For further information, please see Section 3.1.6.6.6 of the FEIS, Section 3.10.1.8 of the Final Jurisdictional EPTR, and Section 3.7.6 of the Final Public Services and Facilities EPTR.
554	The Air Force should focus on the downturn period after peak construction, and the demands on human services agencies during this period, for its mitigation program.	Noted.
555	As local volunteer organizations are already overextended in Nebraska, the suggestion that mitigative measures should be implemented by volunteers is meaningless.	The inmigrant population will potentially include a number of volunteers. These persons may effectively supplement the number of existing volunteers. More specific and detailed mitigation measures are presented; please see Section 7.7.1.4 of the Final Jurisdictional EPTR and Section

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		3.7.6 of the Final Public Services and Facilities EPTR.
556	Social problems will increase as a result of the project, due not only to the inmigrant population but also to increased trauma associated with fear of war	Preventive programs and recommended increased agency staffing and facilities to treat social problems created by the the project and by project-associated population increase are presented as possible mitigations. For further information, please see Section 1.3.3 of the FEIS and Section 3.7.6 of the Final Public Services and Facilities EPTR.
557	The study did not account for the fact that levels of impact to social services often occur at a rate that is faster and higher than the actual percentage of population increase	A range of potential impacts on human services agencies to account for possible disproportionate human service demand levels from the inmigrant population has been provided. For further information, please see Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
558	1) Narrative descriptions for Project Hope, Alcohol Traffic Safety, New Warning Awareness House and Cheyenne Halfway House omitted; 2) Mental Health Center, client load incorrect; 3) Mental Health Center, psychiatric emergency services not addressed.	This revised information was confirmed with each agency and incorporated in the agency descriptions in the final documents. For further information, please see Section 2.1.6.2.6 of the FEIS, Section 3.10.1 of the Final Jurisdictional EPTR, and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
559	Low and Moderate levels of impact for human services are not defined.	These terms are defined in Section 3.1.6.2 of the FEIS.
560	An additional staff member should be added to Laramie County Mental Health during 1985-88. A fund should be established to pay for additional services provided by the Mental Health Center during 1985-88.	Revised staff projections using impact multipliers for all human service agencies were made. Mitigation measures for project-related impacts are presented in Section 3.1.6.6.6 of the FEIS, Section 3.10.1.8 of the Final Jurisdictional EPTR, and Section 3.7.6 in the Final Public Services and Facilities EPTR.
561	Demands on substance-abuse services, especially alcohol abuse services, will increase markedly, requiring additional staff and additional funds.	Revised staff projections were made using impact multipliers. Mitigation measures for project-related impacts are presented in Section 3.1.6.6.6 of the FEIS, Section 3.10.1.8 of the Final Jurisdictional EPTR, and Section 3.7.6 of the Final Public Services and Facilities EPTR.
562	A human service planning body to integrate preventive informal and formal service approaches to	Noted.

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	impact related needs should be implemented.	
563	Needs assessment and a monitoring system recommended in the DEIS should be implemented to provide data for comprehensive planning.	Noted.
564	Innovative approaches to mitigation of impacts will be required due to the short-term nature of needs. Not all needs will dissipate at the end of the construction phase, however.	Noted.
565	How will impacts on Kimball County due to substance abuse, domestic violence, and other social problems related to transients be mitigated?	The annual average transient population projected for Kimball County is 24 at any one time in one year (1989). Approximately one-half of this projected transient population is expected to require assistance from social service agencies. For further information, please see Section 7.7.1.4 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
566	A fund should be established from which support for human services can be drawn when urgent needs arise.	A contingency fund mechanism to provide additional financial resources to human services which experience unanticipated impacts has been included. For further information, please see Section 3.1.6.6.6 of the FEIS, Section 3.10.1.8 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
567	Mitigation measures must be specific about ways to handle the increased transient population impact	Mitigation measures to deal with the impact of the transient population have been expanded and more specific. These measures are presented in Section 3.10.1.8 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services Facilities EPTR.
568	Increased use of volunteers in the Cheyenne Community to mitigate human services impacts can not be relied upon, as existing volunteer services are currently at capacity	As suggested by the City of Cheyenne Coping Mechanisms Subcommittee, increased volunteerism is presented as one component of the overall human services mitigation program. Increased volunteer support will be available in the inmigrant population, which can be effectively utilized through the resources of the Volunteer Information/Action Center.
569	The impacts on human services were incorrectly rated short term only in the DEIS.	The population inmigration to Cheyenne and Laramie County associated with project construction



A task force to assist newcomer integration into the community would prevent the "we they" syndrome and assist adaptation into the community. Newcomer [illegible] attitudes and access through the workplace will be required.

5.74 The deficiencies documented in comments submitted by the City of Cheyenne Mayor's Impact Team should be addressed and corrected in the revised EIS.

5.75 Many Cheyenne area human service agencies need funding more importantly than monitoring. The DEIS failed to discuss many of the non-public human service agencies, such as NEEDS, Inc., which

[illegible]

The [illegible] will be maintained at a lower [illegible] the project operations phase. The lower [illegible] impact following 1990 will result in [illegible] in the long term for a population [illegible] and human services.

Based on discussions with the City of Cheyenne [illegible] Mechanisms Subcommittee, revisions have been made to the more detailed descriptions and analyses of the 8 agencies suggested. For further information, please see Section 3.7.6.2.6 of the FEIS, and Section 3.10.1 of the Final Jurisdictional EPTR and Section 3.6.6.1 of the Final Public Services and Facilities EPTR.

The expanded mitigation measures presented for Human Services impacts contain a measure involving staff development to assist in preparation of the agencies for impact. For further information, please see Section 3.7.6 of the Final Public Services and Facilities EPTR.

A discussion of the involvement of volunteer Action Center, as well as expanded mitigation measures including the use of volunteer services to meet impact needs, has been presented in the revised mitigation Section. For further information, please see Section 3.10.1.8 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.

The human service mitigation measures in Section 3.7.6 of the Final Public Services and Facilities EPTR as well as the Social Well-Being section of the Socioeconomics EPTR and FEIS present similar suggestions.

The FEIS, Final Jurisdictional EPTR and Final Public Services and Facilities EPTR have addressed the issues raised by the Mayor's Impact Team.

The FEIS and Final Jurisdictional EPTR are revised to include eight additional Cheyenne human service providers, including NEEDS, Inc. The final documents include analyses of the

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	supplement the publicly provided services and as such, deserve funding assistance	services provided and potential needs of each agency. For further information, please see Section 3.10.1 of the Final Jurisdictional EPTR and Sections 2.6.b.1 and 3.5.6 of the Final Public Services and Facilities EPTR
576	A needs assessme[illegible]	[illegible] assessments of [illegible] human service agen[illegible] including any current or projected unmet needs as [illegible] program facility staff identified by agency representatives [illegible] for their information [illegible] and 7.6.b.6 of the [illegible] Jurisdictional [illegible] and 7.5.b.6 of the [illegible] as a Public Facilities EPTR

[illegible]

[illegible]

[illegible]

583 The data [illegible] for emergency services and potential impacts [illegible] was interesting.

584 The number of public records resulting from the project population immigration will increase and will require additional resources for the State Archives and Records Division.

585 Agree with DEIS conclusion that Laramie County Road and Bridge Department Shops need to be relocated.

586 The DEIS should include a discussion regarding the impact of increased population on all governmental units which support or provide public services including those locations receiving less than a 5 percent population increase.

and other construction schedule factors into account. The analysis of impacts on human services was based on these population projections, thereby incorporating potential impacts on services due to construction schedule. For further information, please see Section 3.1.1.4 of the FEIS.

Impacts on the regional Nebraska facilities and services located in Scotts Bluff County are addressed in Sections 8.14.1 and 8.14.2 of the Final Jurisdictional EPTR.

Noted

Noted.

Mitigative measures to address problems such as increased record keeping and manpower needs of the county and municipal government departments are presented in Section 3.1.1.4 of the Final Jurisdictional EPTR and Section 3.7.7 of the Final Public Services and Facilities EPTR.

Noted.

The application of the five percent level as the threshold for determining the Area of Concentrated Study is based on research into communities' ability to absorb growth caused by Department of Defense and energy products. The 1975 Gilmore and Duff study of Rock Springs, Wyoming (Denver Research Institute) first put forth the rule of thumb that a five-percent population growth rate "is about all that a small community can absorb." Research done by the Urban Institute for the President's Economic Adjustment Committee in the 1981 Community Impact Assistance Study suggests a more stringent guideline: "...tax burdens in communities with fewer than 5,000 residents

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		begin to rise at growth rates in excess of seven percent, and continue to rise even more rapidly as growth rates increase. In larger jurisdictions, tax burdens do not substantially exceed average levels until annual growth rates are at least ten to twelve percent.
587	Implementation of mitigations will be costly; the DEIS did not identify who would pay. Local rural communities must not be responsible.	Specific mitigation measures and the responsible agencies for implementing and funding are presented in Section 3.1.6.6 of the FEIS. For further information, please see Section 1.7 of the FEIS.
588	It should be noted that federal impact aid for the State of Nebraska has not been recommended.	Noted
589	The suggested projection of a 35,000 sq ft building to be purchased in 1988 for Laramie County School District No. 1 does not state what need it will address. Also, the 1988 time frame is too late to be of assistance during the peak impact year. Mitigation measures must take timing into consideration.	The 35,000 sq ft projection of need for 1988 has been changed. Following subsequent analysis, the final report recognizes a need to construct an elementary school in 1985 based upon baseline projections, and another one in 1988. In 1982 there was capacity for 6600 elementary students. In 1985 the enrollment is projected to be around 7200 elementary students which would require another Anderson-type three-section school (capacity around 500 students). Also, by 1988 there is another projected increase of 500. This reasoning does not take into account the possible reorganization of middle schools. It also assumes that no major construction is planned in secondary schools. However, there is the potential for a gymnasium addition at East High School and vocational education additions at Central High School, both of which are needed now.
590	Impacts to Harrisburg, Nebraska are not fully considered in the DEIS, especially for human services, social services, and quality of life. Harrisburg should be included in the Area of Concentrated Study for these resources.	Potential impacts on services in Harrisburg, Nebraska, were not analyzed in detail as no inmigration was projected for Harrisburg, and therefore, no service impacts were anticipated.
591	The DEIS fails to evaluate the personnel, equipment and facility needs of the Cheyenne Board of Public Utilities resulting from the project.	The Final Utilities EPTR addresses project related needs for the City of Cheyenne Board of Public Utilities. Please see Appendix D of the Final Jurisdictional EPTR for analysis of facilities

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592	Staff, equipment and facilities needs of the Cheyenne Board of Public Utilities have not been identified.	Projected staff needs of the Board under base and project conditions are included in Section 3.2.3.3.3 of the Final Jurisdictional EPTR and Section 3.5.1.2.5 of the Final Utilities EPTR. An analysis of the Board's facilities is in Appendix I of the Final Jurisdictional EPTR.
593	Mitigations for any impacts on the Cheyenne Board of Public Utilities should be described.	No impacts on the staff, equipment or facilities of the Board requiring mitigation are identified.
594	The Wyoming Public Defender's office provided corrections to page 3-362 of the Draft Jurisdictional EPTR.	Noted.
595	The FEIS should identify strategies to respond to impact upon human service agencies including the types of problems to be faced, staffing requirements, training, technical and financial assistance, program capabilities and requirements etc.	Detailed mitigation measures for potentially affected human service agencies are presented in Section 3.7.6.6 of the FEIS and Section 3.7.6 of the Final Public Services and Facilities EPTR.
596	Acceleration of public services staffing should be done prior to peak project employment because job seekers will arrive prior to that time.	The analysis of impacts on government services was based on population projections which included job seekers in the estimated inmigration for each impact year. Thus, additional needs for job seekers are already accounted for in the projections.
597	The Draft Jurisdictional EPTR stated that there would not be impacts on emergency medical services, roads, and law enforcement in Platte County. This may be a wrong conclusion.	The impacts have been reassessed. For further information, please see Sections 4.1.2.3 and 4.9.2.3 of the Final Jurisdictional EPTR.
598	The Draft Jurisdictional EPTR stated that there would not be impacts on emergency medical services, roads, and law enforcement in Goshen County. This may be a wrong conclusion.	Emergency medical services and trained staff will need to be provided at construction sites. No additional police officers will be required due to the low projected population inmigration. The impacts have been reevaluated in Section 5.9.2.3 of the Final Jurisdictional EPTR and Section 5.1.2.3 of the Final Public Services and Facilities EPTR.
599	Laramie County Extension Service will have an additional workload with impact, and outreach	The analysis projects population increases which are expected to be too small to result in impacts

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	services will be needed.	to the areas of responsibility of the extension services.
600	All Laramie County departments have stated that their space and personnel are at maximum capacity and that any increase in demand will cause deterioration of service.	This information was used as appropriate. For further information, please see Section 3.5.7.9 of the Final Public Services and Facilities EPTR.
601	Residents of Laramie County expect to receive a certain level of service, the highest level of service possible with the available monies. Additional funding will be required to continue to provide services to an increase in population.	The purpose of the Jurisdictional EPTR is to identify impact associated with the Peacekeeper project. Where it was determined that the project would impact both a department and local government finance, analyses were conducted and mitigation measures presented. Determination of mitigation monies can be found in the Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment
602	Additional teachers, classrooms, and materials will be required in Nebraska due to project impacts.	In the initial analysis, the projected increased student enrollments were small and therefore, no projections were made for an increase of staff, space, and facilities. Impacts of inmigrant population on school enrollments have been reevaluated in the final analysis. A total peak year (1987) impact student enrollment of 79 students are projected for Kimball County. No additional space will be required. For further information, please see Section 7.5.1.3 of the Final Jurisdictional EPTR, and Section 3.5.1.6 of the Final Public Services and Facilities EPTR.
603	Why has the study included only one out of the seven elementary schools in Albany County?	Albany County is no longer within the Region of Influence of Public Services and Facilities; no impact population has been allocated there.
604	For planning purposes, the Laramie County School School District No. 1 will require a more detailed analysis of projected staff requirements by grade level and by year.	Projected staffing needs directly related to the project were calculated as follows: number of classroom teachers equals number of projected students divided by the number of pupils-to-teachers in 1982 (18.7); number of other certified equals 80 percet of the number of projected students divided by the number of students to certified in 1982 (14.4) - number of classroom teachers; number of non-certified equals 65 percent of number of projected students divided

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		by the number of students to noncertified (24.4). For further information, please see Section 3.8.1 of the Final Jurisdictional EPTR and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
605	It is unclear whether additional certified and noncertified staff are to be full or part time especially in the area of special education staff.	Special education teacher needs are a function of special education student needs. These needs cannot be specifically projected. However, in past experience, transient students generally have required disproportionately more special education than non-transient students.
606	There will be problems associated with the hiring of teachers who would not be tenured.	Compromise on quality of teaching is not implied, but rather, an alert to the possibility of being overstaffed with tenured teachers. However, baseline projections show the eventual need for these additional teachers for the future baseline population. The problem occurs when the need is not in the same level (elementary vs. secondary) or in the same area (special education vs. biology). For further information, please see Section 3.8.1 of the Final Jurisdictional EPTR and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
607	More information is needed on what space is available for remodeling, other than that in the old Johnson Junior High.	Churchill Elementary School presently is utilizing 4 out of 12 classrooms. Four of the eight (2nd floor) are being used by Laramie County Community College and the remaining four (3rd floor) are empty. This furnishes one possibility for remodeling. Also, additions to schools such as adding a section to an existing two section school may be considered as a remodeling project.
608	It is unclear whether projected space requirements include only classrooms, or support areas as well for elementary schools in Laramie County School District No. 1.	The projected space requirements referred to in 1987 for elementary students are based upon 122 sq. ft. per elementary student which includes available space. The 122 sq. ft. per student (grades 1-6) was arrived at by a committee assigned the task of developing the educational specification for Anderson Elementary School. Existing space deficiencies were not defined in terms of service areas such as cafeteria, restrooms, etc. For further information, please

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609	The education needs analysis should provide [illegible] demands and provide estimated costs [illegible] County School District No. 1	[illegible] see Section 3.6.4.4 of the Final Supplemental Source EPTR and Section 3.5.4.4 of the Final Public Services and Facilities EPTR. Projected demands for additional school space [illegible] at the elementary, [illegible] where approximately 46,000 additional sq. ft. will be needed are projected in Section 3.6.4.4 of the DEIS, Section 3.6.4.4 of the Final Supplemental Source EPTR and Section 3.5.4.4 of the Final Public Services and Facilities EPTR.
610	Special use space such as gyms and music rooms must be taken into consideration. The majority of needs will be for classroom space and [illegible] impact other special use areas.	The site acquirements such as playgrounds [illegible] and [illegible] multi-purpose space, etc. will have to be taken into consideration before a school district could be utilized as a classroom. This presumably would be taken into account at the planning stages, especially [illegible] of the regulations adopted by the Wyoming State Department of Education.
611	Additional mitigation measures and related costs have been provided by the State Department of Education.	The recommended measures provided by the State Department of Education are very specific and provide additional detail to the more general mitigations presented in the DEIS. However, many of these measures would be appropriate to meet existing needs and base the future projected needs, but are not directly related to the project impacts.
612	The mitigation measures for education should be quantified and more detailed in Laramie County, School District No. 1.	The mitigation measures were reviewed in light of the comments by the Wyoming Department of Education and Laramie County School District No. 1. The mitigation measures should be viewed only as a list of possibilities. For further information, please see Section 3.8.4.4 of the Final Jurisdictions EPTR and Section 3.7.4.4 of the Final Public Services and Facilities EPTR.
613	The costs of renovation must be taken into account, in addition, there is public opposition to the use of the old Johnson Junior High School.	Based upon discussions at the time a new Johnson Junior High School was being considered, the suggestion was made to use the old Johnson Junior High School as an overflow building during impact periods relating to the project. However, because the expenditures associated with building and fire

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ISSUE CODE	ISSUE TEXT	[illegible]
614	The reassignment of special program space [illegible] be accomplished with the suggestions made [illegible] Laramie County Community College is already [illegible] all of their space and the schedules would conflict.	[illegible] may be [illegible] mitigation measure. [illegible] measure would be dependent [illegible] impact can not be determined at this point. Laramie County Community College is located [illegible] far from Johnson Junior High and Rossman Elementary School, therefore transport time [illegible] Laramie County Community College would not be major.
615	School district space standards for schools must be reviewed. Mitigations which recommend remodeling and new construction to meet space needs must take these standards into account.	Since the [illegible] jurisdictions EPTR was written the Wyoming State Department of Education has adopted rules and regulations for site selection, new school construction and remodeling of existing structures for public school buildings. Based on available information to date, all the existing 22 elementary schools in Cheyenne are presently below the minimum site standards adopted by the Board of Laramie County School District No.
616	As two separate methodologies were used for the enrollment projections, an analysis should be undertaken to assure that the methods are compatible.	This analysis was performed for the different projections. The state's model was chosen for the baseline due to its past accuracy and the grade by grade projections. The age cohort model was projected in 5-year age ranges which included 15 through 19 year olds because the state model does not accommodate impact scenarios. Not all 18 and 19-year olds are enrolled in the public schools. Therefore, allowances were made for this age group for reconciliation with the state's model. For further information, please see Appendix A of the Final Public Services and Facilities EPTR.
617	The projected increased enrollments in South Cheyenne are based upon a different assumption concerning inmigrant population levels than other analyses in the Cheyenne area.	The population distribution projections have been revised. For further information, please see Section 3.8.1.3 of the Final Jurisdictions EPTR and Section 3.5.1.4 of the Final Public Services and Facilities EPTR.
618	The projected timing of enrollment impacts is unclear.	Enrollments were projected on a quarterly basis for the 1984-1992 time period. This information can be found in Section 3.8.1.3 of the Final Jurisdictions EPTR and Section 3.5.1.4 of the

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		Final Public Services and Facilities EPTR.
619	The payment of tuition to enable students to attend private schools would potentially create problems due to differing curricula. This mitigation would be limited.	Attendance at a nonpublic school would be voluntary and would not involve Laramie County School District No. 1.
620	The discussion of impacts on Laramie County Community College should address training needs and programs.	Secondary employment needs may require additional vocational training programs. Impacts on Laramie County Community College are assessed in further detail in Section 3.8.1.3.5 of the Final Jurisdictional EPTR and Section 3.5.1.4.1.5 of Final Public Services and Facilities EPTR.
621	A map showing the cluster system should be provided for Laramie County School District No. 1.	A map is provided in Section 3.8.1.1 of the Final Jurisdictional EPTR and Section 2.6.1.1 of the Final Public Services and Facilities EPTR.
622	The Draft Jurisdictional EPTR neglects busing issues related to changed routings, space and staff needs.	Based on the neighborhood projections, an analysis was done by cluster. It is possible that the District may want to review the cluster boundaries and busing traditions associated with F.E. Warren AFB, and develop alternative approaches. For further information, please see Section 3.8.1.3.4 of the Final Jurisdictional EPTR and Section 3.5.1.4.4 of the Final Public Services and Facilities EPTR.
623	If additional buses are to be purchased, more information is needed on type and size of buses, as well as needed additional garage space and maintenance/operations staff.	The number of buses was projected at the peak year of impact. These are assumed to be regular buses with capacities of around 50. No special buses for handicapped students were considered due to the difficulty of projecting the number of handicapped students. The bus garage would be inadequate to house any additional vehicles unless it were remodeled or some nonbus vehicles were moved to another facility. The additional drivers and mechanics have been accounted for in the non-certified personnel section projections. For further information, please see Section 3.8.1.3.4 of the Final Jurisdictional EPTR and Section 3.5.1.4.1.4 of the Final Public Services and Facilities EPTR.
624	The Draft Jurisdictional EPTR does not include the impact on the food service programs.	The food service program is included in Section 2.6.1.1 of the Final Public Services and

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		Facilities EPTR
625	The Draft Jurisdictional EPTR states that special education enrollment will increase but does not provide further details on program and facility needs in Laramie County School District No. 1.	Several variables are involved in organizing special education classes. Generally the resource rooms handle about 6 or 7 children during one period. A student may require 3 hours of special education a day, or a week - based upon individual students' needs. In addition, enrollment distribution among schools is a major factor in determining additional special education space requirements. For further information, please see Section 3.8.1.3.3.1 of the Final Jurisdictional EPTR and Section 3.5.1.4.1.3 of the Final Public Services and Facilities EPTR.
626	The mitigations offered in the Draft Jurisdictional EPTR do not recognize the need for expansion of educational programs.	A change in curriculum may result from the President's Commission on Education. It is also recognized that vocational programs may be expanded to train workers for the project. However, specific curriculum projections were not made, as these are District decisions
627	The Draft Jurisdictional EPTR does not address the impact need for additional school equipment and materials.	The specific equipment and material needs are not projected for each student because this is not possible unless specifics of existing inventories, course schedules, and numbers are known. However, major equipment (buses) and facility needs resulting from the project, have been noted.
628	The Draft Jurisdictional EPTR should provide more detail regarding the location of school facilities and busing requirements in Laramie County School District No. 1.	An analysis was completed for projected impact student location by cluster. Also, the projected numbers of buses needed by year were indicated. For further information, please see Section 3.8.1.3.1 of the Final Jurisdictional EPTR and Section 3.5.1.4.1 of the Final Public Services and Facilities EPTR
629	Additional mitigation information is needed for public education.	More detail on mitigations is presented in Section 3.8.1.4 of the Final Jurisdictional EPTR and Section 3.7.1 of the Final Public Services and Facilities EPTR
630	Additional law enforcment services will be required from the Albany County Sheriff's Department due to the projected impacts on	Regional recreation and law enforcement analyses indicate that the increased demands on Albany County law enforcement services may require

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	recreation areas in the county.	additional services for the county sheriff. The final jurisdictional EPTR contains a revised analysis of regional recreation demand, and suggests an additional officer may be needed. Section 3.1.11.6.1 of the FEIS presents mitigation measures to meet this need.
631	Impacts on law enforcement services should be assessed based upon the number of workers within Platte County.	A uniform analytical methodology was applied that based projected needs on resident population. Fewer workers were projected to live in Wheatland or Torrington than in Cheyenne. Combined with the fact that the project-related silos located in Platte and Goshen Counties are in the southern parts of those counties, most workers in Platte and Goshen Counties will likely go toward Cheyenne when their shift is over and not toward Wheatland or Torrington. Since these workers would tend to not go to the population centers of Platte and Goshen Counties, infractions of the law other than traffic offenses are unlikely to occur. Traffic accidents are generally a function of vehicle miles traveled and this indicator is not projected to increase sufficiently to place any measurable additional burden on the Sheriff's Department in either county.
632	A new jail facility will be required in Goshen County in the future to meet national standards.	The addition referred to in the DEIS was not meant to refer to the large addition presently under construction but rather to the separate building near the Courthouse more commonly referred to as the County Jail building. The square footage figures cited for the Sheriff's Department are correct but the structure was referred to incorrectly. Modifications to the County jail building are under consideration but have not yet been decided on or budgeted.
633	Impacts on law enforcement services should be assessed based upon the number of employees working within the county who do not necessarily live within Goshen County.	A uniform analytical methodology was applied that based projected needs on resident population. Fewer workers were projected to live in Wheatland or Torrington than in Cheyenne. Combined with the fact that the project related silos located in Platte and Goshen Counties are in the southern parts of those counties, most workers in Platte and Goshen counties will likely go toward Cheyenne

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		with treatment facilities over and not toward Wheatland or Torrington. Since these workers would tend to not go to the population centers of Platte and Goshen Counties, infractions of the law other than traffic offenses are unlikely to occur. Traffic accidents are generally a function of vehicle miles traveled and this indicator is not projected to increase sufficiently to place any measurable additional burden on the Sheriff's Department in either county.
634	Construction of the new City-County jail in Cheyenne will probably take longer than stated in the Draft Jurisdictional EPTR.	It is not certain that the proposed law enforcement facility will be built. Both the City and the County are studying the matter carefully, inasmuch as the facility is needed, with or without the Peacekeeper project. Completion of the facility was not forecast for 1984, only the need for the facility in that year was forecast. The Project Coordinator for the proposed facility indicated that completion of the building is not likely prior to late 1986 or early 1987. The amount of impact that will occur prior to the completion of the facility depends on its actual completion date. For further information, please see Section 3.1.2.2 of the Final Jurisdictional EPTR and Section 3.5.2.1 of the Final Public Services and Facilities EPTR.
635	Space needs for projected law enforcement staff in Cheyenne and Laramie County should be included in the Jurisdictional EPTR.	Projected space needs for both sworn personnel and civilian staff of the Cheyenne Police Department and the Laramie County Sheriff's Department are included in Sections 3.1.2.3 and 3.2.6.3 of the Final Jurisdictional EPTR and Sections 3.5.2.9 and 3.5.2.10 of the Final Public Services and Facilities EPTR.
636	Mitigative measures should include short-term options to meet project-related demands until the new law enforcement facility is completed in Cheyenne.	Law enforcement facility needs until the completion of the new facility will have to be met by the existing facility and possibly temporary additional facilities if required. For further information, please see Section 3.2.6.3 of the Final Jurisdictional EPTR and Section 3.5.2.9 of the Final Public Services and Facilities EPTR.
637	Law enforcement projections in Laramie County do not include civilian support personnel. They	Additional sworn officers and civilian support personnel will be required as a result of the

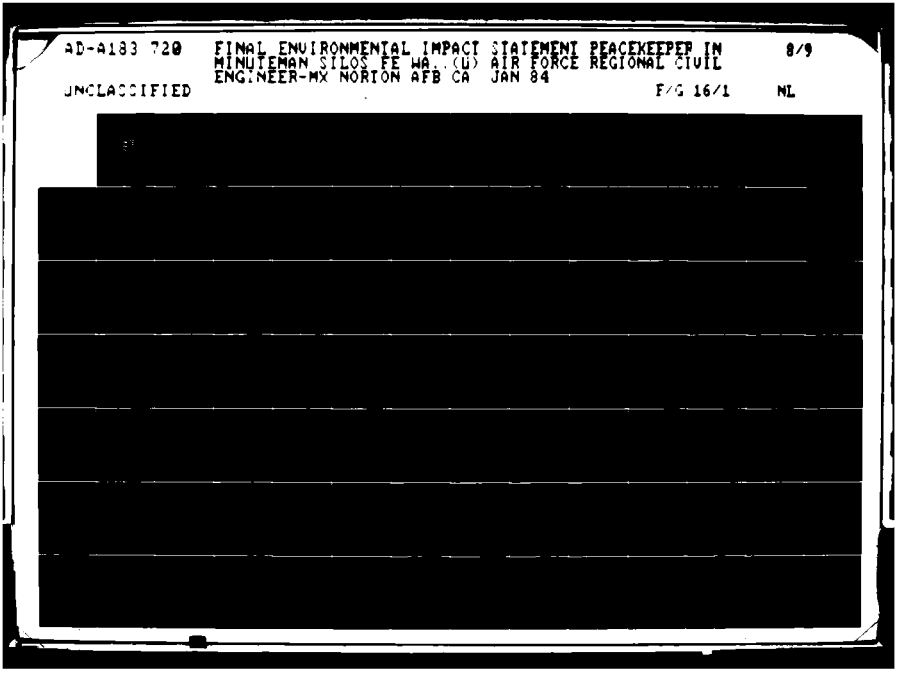
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	include only sworn officers.	project population in Laramie County. Projected staff needs including both sworn officers and civilian personnel are included in Section 3.1.2.3 of the Final Jurisdictional EPTR and Section 3.5.2.9 of the Final Public Services and Facilities EPTR.
638	The Draft Jurisdictional EPTR bases projections on existing ratios of law enforcement services-to-population and does not consider increased demand due to the demographic characteristics of the project workforce	The demographic characteristics of the population of Laramie County are not projected to be altered by the project to an extent significant for law enforcement. Data are not available to permit a projection of any changes in crimes due to the inmigration to a community of a given number of construction workers. An analysis was done to project the number of arrests that might be expected to occur in 1987 (the year of peak inmigrant population size) based on age-specific arrest rates. This analysis was undertaken because, compared to the existing Laramie County population, the inmigrant population is projected to have a somewhat higher proportion of its members in the more arrest-prone age categories (15-35). For further information, please see Section 3.1.2.3 of the Final Jurisdictional EPTR and Section 3.5.2.9 of the Final Public Services and Facilities EPTR
		[illegible] needs projections have been made for both marked and unmarked vehicles based on existing [illegible] of total staff to each vehicle type. For [illegible] information, please see Sections 3.1.2.1 [illegible] of the Final Public Services and [illegible] EPTR
		[illegible] the [illegible] needs for the Laramie County [illegible] are based on law enforcement [illegible] projection for the popu[illegible] [illegible] arrest potentia[illegible] [illegible] of the [illegible]

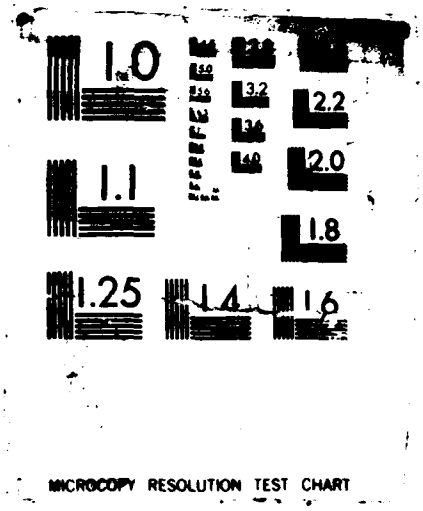
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	mitigation section.	the impacts of growth. The mitigation section also presents additional measures to mitigate impacts by providing for the needs (such as training, staff, cars, and space) that have been identified in the text.
645	Educational and publicity measures are only partial mitigations which will be insufficient to deal with law enforcement impact problems in Laramie County.	Additional mitigation planning and program implementation will be carried out by the City of Cheyenne and Laramie County in conjunction with the federal government. Some planning monies have already been received for this purpose.
646	The methodology for determining impacts on the Laramie County Sheriff's Department is questioned.	The methodological basis for determining impacts on the Sheriff's Department is a modified per capita approach. Per capita projections were made in order to maintain existing service levels. In addition, other variables were examined to establish any basis for modifications of the service level. These included unemployment, crime rates, types of workers, and vehicle use. Due to a projected degradation in intersection service levels, two additional officers were recommended for traffic control duties. In addition, these officers can be utilized for nontraffic related law enforcement activities during non-peak-hour conditions.
647	Serious crimes are not the only impacts; all types of crime represent impacts on law enforcement.	The FBI's Part 1 crime data are presented because data on the total number of crimes are often not available. Law enforcement agencies keep records required by the FBI's Uniform Crime Reporting Program (Part 1 crimes) but often do not keep records on Part 2 or total crimes. This is true for the City of Cheyenne Police Department, and most other law enforcement agencies contacted during this study.
648	The Draft Jurisdictional EPTR overestimates the capacity of the Cheyenne City jail.	Whether the capacity of the Cheyenne City jail is calculated on the basis of the number of bunks or the per-prisoner space recommendation of the American Correctional Association, that capacity is reduced when the need arises to segregate female adult, female juvenile and male juvenile prisoners from each other and from adult male prisoners. Most of the cells in the Cheyenne

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		jail have eight bunks. One female adult prisoner, for instance, would require a separate cell. This would reduce the jail's capacity by seven, based on the number of bunks or by some smaller number based on the American Correctional Association standards.
649	Law enforcement facility needs for Cheyenne and Laramie County are underestimated.	A projection of a joint law enforcement facility that is substantially larger than the projection in the Draft Jurisdictional EPTR has been included in the final analysis. For further information, please see Sections 3.1.2.3 and 3.2.6.3 of the Final Jurisdictional EPTR and Sections 3.5.2.9 and 3.5.2.10 of the Final Public Services and Facilities EPTR.
650	The Draft Jurisdictional EPTR did not examine needs for law enforcement in the Cheyenne City park system.	Park security in Cheyenne is already a concern of the City of Cheyenne Police Department which has an officer on full-time park patrol duty during the summer months. The Police Department feels that two officers are necessary to do an adequate job, but necessary manpower has not been available. As with other aspects of the law enforcement analysis, law enforcement needs in the City's parks will increase only in proportion to growth and hence it is assumed will be covered by the projected staff increases for the Police Department at the same level as they are covered at the present time.
651	Due to the impact of unemployed persons entering the community, the impact on law enforcement will be greater than reported.	Projections of the number of arrests that might be expected in the year of peak project-related population increase (1987) based on age-specific arrest rates indicate that in that year arrests could be about 1.2 percent greater than might otherwise be expected because of the age mix of the inmigrant population which would be inclusive of unemployed persons. The additional number of arrests is not considered significant. For further information, please see Section 3.2.6.3 of the Final Jurisdictional EPTR and Section 3.5.2.10 of the Final Public Services and Facilities EPTR.
652	The projections used to estimate law enforcement staffing needs in the City of Cheyenne do not	The Final Public Services and Facilities EPTR takes into consideration a range of law enforce-

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	include secondary manpower multipliers.	ment manpower needs by use of sensitivity range. For further information, please see Section 3.5.2.10 of the Final Public Services and Facilities EPTR.
653	The Draft Jurisdictional EPTR underestimates the need for additional law enforcement officers in the City of Cheyenne.	The existing ratio of 1.7 sworn officers per 1,000 population is one that the City of Cheyenne has determined to be appropriate for present needs. Available data suggests that there is a potential for an increase in demands on law enforcement agencies that is disproportionate to the population increase.
654	The current number of law enforcement vehicles in Cheyenne is 1.0 per officer, not 1.0 per 3.5 officers.	Information gathered in preparation of the report indicated the 1.0 vehicle per 3.5 officers ratio. The one-man one-vehicle system has not yet been established. The ratio of vehicles to officers is verified in Section 3.2.6.1 of the Final Jurisdictional EPTR and Section 3.5.2 of the Final Public Services and Facilities EPTR.
655	The baseline for determining additional vehicle needs was incorrect, as it did not include unmarked vehicles, therefore the impact projections are inaccurate.	Needs for both marked and unmarked vehicles for the Police Department have been included in the final analysis. For further information, please see Section 3.2.6.1 of the Final Jurisdictional EPTR and Section 2.6.2.2 of the Final Public Services and Facilities EPTR.
656	The Cheyenne Police Department supports the one-patrol-officer one-car plan.	Implementation of the one-man one-car program, strongly advocated by the Cheyenne Police Department, is a decision for the City of Cheyenne to make. The need for such a program exists independently of the Peacekeeper project.
657	The Draft Jurisdictional EPTR underestimates traffic-related impacts in Cheyenne.	The effect on the Cheyenne Police Department of increased traffic will be a function of road improvements, traffic control techniques (whether or not involving Police Department personnel), public transportation and many other factors. The general conclusion of the transportation study is that accidents will increase more slowly than the population increases. Therefore, the projected staff increases for the Cheyenne Police Department which are also proportionate to the population increase, should be adequate to handle that need.

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		For further information, please see Section 3.2.10.1.3 of the Final Jurisdictional EPTR.
658	The Draft Jurisdictional EPTR did not adequately address impacts on law enforcement due to civil disturbances, as it stated there was no method to estimate or quantify anticipated needs for additional manpower.	It is agreed that the likelihood of civil disturbance is predictable, at least in general terms. What is not predictable is how passive or how violent a disturbance might be, whether it would be located on military property, in the City of Cheyenne or in Laramie County, how long it might last, how many persons might be involved, and whether it would be aimed solely at obtaining publicity by orderly demonstration, or might lead to arrests by passive resistance or active attempts at disruption of public, private, or military activities. The answers to these questions will determine the response of and costs to local law enforcement agencies.
659	The law enforcement impact projection ignores civil disturbance issues and impacts on manpower and management.	Additional research regarding civil protests to Department of Defense actions has included interviews with the Sheriff's Departments of Santa Barbara County, California (Vandenberg AFB), Kitsap County, Washington (Trident Submarine Base), and Seneca County, New York (Seneca Army Depot) where such protests have taken place recently. The protests ranged in size from 5 to 5,000 persons and lasted from 1 day to 1 month. However, in all cases, law enforcement officials knew in advance that demonstrations would occur, where they would occur and, often, how large the protest organizers expected them to be. Because one of the main purposes is publicity, such protests tend not to occur secretly. While additional manpower may be needed, experience elsewhere indicates that rapid mobilization of law enforcement officers is generally not necessary because of the commom availability of advance notice.
660	Projected Part 1 crime impacts are not supported by evidence of other impacted communities.	Comparisons to Rock Springs, Gillette, and Evanston are not appropriate inasmuch as these were smaller communities with a smaller resource base which grew several times more rapidly and for longer periods of time as projected for Cheyenne. Kitsap County, Washington, home of the west coast

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		Trident submarine base, is roughly comparable to to Laramie County in terms of population and growth projected. Data from that county indicate that Part 1 crimes per 1000 population did increase during a period of sustained growth but that the rate was generally lower than it had been prior to the growth. During that same period, complaints received by the Sheriff's Department were steadily declining. Other studies, referred to in the DEIS, indicate that Part 1 crimes do not tend to increase during major construction projects.
661	The Draft Jurisdictional EPTR neglects impacts due to increased law enforcement service calls for service in Laramie County.	With regard to calls for service, calls per sworn officer in the Cheyenne Police Department have declined 23 percent over the last 10 years (1973-1983). The first half of that 10-year period saw an average of 478 calls for service per sworn officer. The average during the second half of the 10-year period was 403 calls for service per sworn officer, and the decline was continuing. Thus, it appears that the department could absorb increased calls for service per sworn officer without negatively affecting historic average service levels.
662	The Jurisdictional EPTR makes no mention of the District Court in Albany County. The report writers did not understand that Wyoming has a District Court System.	The report writers did understand the District Court System currently operative in Wyoming. For this reason a detailed analysis was prepared for each District Court facility operative in each county within the area of site influence. Based upon population allocations in the final analysis, Albany County is not within the area of site influence for the Final Jurisdictional EPTR.
663	The Jurisdictional EPTR makes no mention of the District Court in Platte County. The report writers did not understand that Wyoming has a District Court System.	The report writers did understand the District Court System currently operative in Wyoming. For this reason a detailed analysis was prepared for each District Court facility operative in each county within the area of site influence. The discussion of the District Court for Platte County is found in Section 4.9.5 of the Final Jurisdictional EPTR.
664	The Jurisdictional EPTR makes no mention of the District Court in Goshen County. The report	The report writers did understand the District Court System currently operative in Wyoming.

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	writers did not understand that Wyoming has a District Court System.	For this reason a detailed analysis was prepared for each District Court facility operative in each county within the Area of Site Influence. The discussion of the District Court for Goshen County is found in Section 5.9.5 of the Final Jurisdictional EPTR.
665	The baseline Courthouse capacity is incorrectly reported.	This information has been corrected in the final documents. For further information, please see Section 3.1.3.1 of the Final Jurisdictional EPTR and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
666	The Draft Jurisdictional EPTR did not include the Clerk of the County Court in the Laramie County government section.	The Laramie County government section references the Clerk of the County Court in Section 3.1.1.1 of the Final Jurisdictional EPTR and Section 2.6.7.1 of the Final Public Services and Facilities EPTR.
667	The Draft Jurisdictional EPTR failed to discuss the District Court system in Laramie County. The report writers did not understand the Wyoming District Court system.	The report writers did understand the District Court System currently operative in Wyoming. A detailed analysis was prepared for each District Court in the counties in the Area of Site Influence. The discussion of the District Court for Laramie County is contained in Section of the Final Jurisdictional EPTR.
668	The analysis of future needs in the Laramie County Court system should include both current and future requirements.	The analysis of future needs is based on additional facilities and staff under baseline future conditions and project impacts. In most cases, project impact conditions cause acceleration of future baseline needs. For further information, please see Sections 3.1.3.2 and 3.1.3.3 of the Final Jurisdictional EPTR and Sections 3.5.3.1 and 3.5.3.8 of the Final Public Services and Facilities EPTR.
669	The Mayor of Cheyenne predicts that the project will bring in a 15 percent population increase. This increase will affect the court system.	Population inmigration projections for the period 1984 through 1992 were refined and are presented in Section 2.3 of the Final Jurisdictional EPTR. Impacts on the inmigrant population projected on the court system are presented in Section 3.2.7.3 of the Final Jurisdictional EPTR and 3.5.3.9 of the Final Public Services and Facilities EPTR.
670	Mitigation of project-related needs such as addition of a part-time judge and expansion of	In the final analysis, the additional staff, facilities, and space needs are quantified.

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	court hours is at the option of local officials and should not be determined by the analysts.	Based on these projections, various mitigative measures are identified for consideration by responsible local officials. For further information, please see Section 3.1.3 of the Final Jurisdictional EPTR and Section 3.5.3.8 of the Final Public Services and Facilities EPTR.
671	The general mitigation measures offered for consideration in Laramie County are not clear, nor have they been approved by the responsible members of the court system at city or county levels.	Additional staff, facilities, and space needs are quantified in the final analysis. Various mitigative measures based on these projections are identified for consideration by responsible local officials. For further information, please see Section 3.1.3.4 of the Final Jurisdictional EPTR and Section 3.7.3 of the Final Public Services and Facilities EPTR.
672	Additional information should be provided on the Laramie County Court staff and space costs.	The additional information has been incorporated in Section 3.1.3.3 of the Final Jurisdictional EPTR and Section 3.5.3.8 of the Final Public Services and Facilities EPTR.
673	It is unclear whether references are to District or County Attorney for Laramie County.	References have been clarified to read "County Attorney." For further information, please see Section 3.1.1.1 of the Final Jurisdictional EPTR and Section 2.6.7.1 of the Final Public Services and Facilities EPTR.
674	The analysis of increased staffing needs for the Laramie County Court is not quantitative enough to determine the precise number of additional judges and support staff.	In response to this and other comments, the analysis has been revised to be more quantitative. The final analysis has projected the number of additional judges and support staff under both baseline and impact conditions. For further information, please see Section 3.1.3.2 and 3.1.3.3 of the Final Jurisdictional EPTR and Sections 3.5.3.1 and 3.5.3.8 of the Final Public Services and Facilities EPTR.
675	The Draft Jurisdictional EPTR did not include assessment of the space needed for the recommended additional judge in the Laramie County Courts.	Based on current judge-to-case ratios, additional District Court Judge loads through 1987, and an additional full-time judge in 1988 have been projected. The space needs for additional staff were reevaluated. For further information, please see Section 3.1.3.3 of the Final Jurisdictional EPTR and Section 3.5.3.8 of the Final Public Services and Facilities EPTR.

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676	Section 3.1.3.4 of the Draft Jurisdictional EPTR lists six suggested mitigative measures without identifying any preference as to which should be implemented.	The purpose of the subsections concerning mitigative measures in the Jurisdictional EPTR is to offer for consideration by affected state agencies, counties and municipalities a "menu" of mitigative measure from which to choose based on, among other things, funding and policy priorities. It would be a presumably undesirable assumption of state policy-making points to express such a preference among the mitigative measures.
677	The proposed mitigation of using night court for some cases will necessitate additional spending which was not considered in the analysis.	If staff are available, night court, especially for minor traffic offenses, is still a viable alternative to expanding daytime hours of court operation. If a part-time judge, part-time clerk, and part-time bailiff are made available, night court could operate to dispose of a significant number of cases without immediately having to acquire additional space.
678	The report did not include civil cases.	Civil cases are now included in the analysis. Please see Section 3.1.3.1 of the Final Jurisdictional EPTR and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
679	The Draft Jurisdictional EPTR incorrectly presents statistics on Laramie County Court caseload and case backlog. The analysis is too general.	Concerning the apparent monthly backlog revealed by the caseload statistics, further investigation has revealed that the present backlog is frictional in nature and therefore not indicative of any unusual delay. The final analysis has been amended accordingly. For further information, please see Section 3.1.3.1 of the Final Jurisdictional EPTR and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
680	The capacity of the Laramie County Court will be exceeded in 1985.	Although the staff and facilities currently serving the Laramie County Court are sufficient to meet the present caseload, the Court is now at capacity and any significant increase in caseload would degrade service levels or contribute to backlog. For further information, please see Section 3.1.3.2 of the Final Jurisdictional EPTR.
681	The Laramie County Court currently needs additional court and office space.	The Laramie County Court's need for additional office and court space has been reevaluated in the

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		final analysis. For further information, please see Section 3.1.3.1 of the Final Jurisdictional EPTR and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
682	The Draft Jurisdictional EPTR indicates that the increased caseload in the Laramie County Courts will require additional court hours and staff but does not show the need for additional court space and facilities.	The projected space needs of the Laramie County Court were reevaluated in the final analysis. For further information, please see Section 3.1.3.3 of the Final Jurisdictional EPTR and Section 3.5.3.8 of the Final Public Services and Facilities EPTR.
683	In Section 3.2.7.1 of the Draft Jurisdictional EPTR, the discussion of the Cheyenne Municipal Court was mixed up with the discussion of the Cheyenne City Attorney's Office.	The discussion of the Cheyenne City Attorney's Office (which carries out the prosecutorial function for the Municipal Court) was included in the discussion of the Cheyenne Municipal Court rather than in the section concerning general government because the staffing and space needs of the two organizations are closely related and dependent upon a common variable - caseload. It was thought that joining the discussion of these two related organizations would make the analysis both easier to read and more meaningful.
684	The analysis of increased staffing needs for the Cheyenne Municipal Court is not quantitative enough to determine the precise number of additional judges and support staff.	In response to this and other comments, the analysis has been revised to be more quantitative. The final analysis has projected the number of additional judges and support staff under both baseline and impact conditions. For further information, please see the text and tables in Section 3.2.7.2 and 3.2.7.3 of the Final Jurisdictional EPTR.
685	The Draft Jurisdictional EPTR provided inaccurate caseload statistics for the Torrington Municipal Courts.	The statistics cited are accurate according to the data gathered. Verification of data did not indicate any inaccuracies.
686	The Draft Jurisdictional EPTR presented inaccurate information on court caseloads in Wyoming, indicating incorrectly that the court is falling behind.	Concerning the apparent monthly backlog revealed by the caseload statistics, further investigation has revealed that the present backlog is frictional in nature and, therefore, not indicative of any unusual delay. The final analysis has been amended accordingly, and includes more recent statistics. For further information, please see

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		Section 3.1.3.1 of the Final Jurisdictional EPTR and Section 2.6.3.1 of the Final Public Services and Facilities EPTR.
687	The draft Jurisdictional EPTR did not reflect the relationship between impacts on Law Enforcement and on Criminal Justice in Wyoming.	The final analysis has resulted in a better reflection of the relationship between law enforcement and criminal justice. Increased criminal caseloads are predicted based not only on population levels but also on the projected number of increased arrests. For further information, please see Section 3.1.3.3 of the Final Jurisdictional EPTR and Section 3.5.3.8 of the Final Public Services and Facilities EPTR.
688	The Draft Jurisdictional EPTR does not discuss the impact on Wyoming District Court caseload attributable to increased caseloads at lower-level courts.	The number of criminal appeals to the District Court was included in that Court's total caseload. Because it is not possible to predict the change in the number of appeals due to the inmigrant population, the analysis of the Court's caseload assumes the appeal-to-original-filing ratio will remain the same over time. Therefore, only the Court's total caseload was analyzed. Analysis of the District Courts for those judicial districts within the Area of Site Influence was undertaken on a county basis. This information is found within those sections of the Jurisdictional EPTR dealing with the particular county.
689	More detail is need on potential fire protection in Cheyenne resulting from higher housing densities and possible new fire annexations. A new fire station may be required to meet future demands.	A reassessment of projected inmigration and population allocation within the Cheyenne Urban Area, including South Cheyenne, results in housing allocations that do not increase current housing densities. Therefore no impacts on fire protection facilities due to annexation of new areas are anticipated. For further information, please see Section 3.2.8.3 of the Final Land Use EPTR and Section 3.5.4.6 of the Final Public Services and Facilities EPTR.
690	Additional information and analysis of the Cheyenne Fire District No. 2 capabilities is suggested.	Fire District No. 2 provides crucial fire and rescue services not only to residents of the District who support it but also to a large area of western and northern Laramie County where there is no organized fire district. Since the original data were collected, the

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		District has increased the number of authorized volunteers from 25 to 27. This figure does not include five reserve volunteers. The District is encouraged to make whatever adjustments are possible to reduce demands on individual volunteers while maintaining the high levels of service it presently provides. The various mutual aid agreements between fire protection agencies in the Cheyenne area are an important part of the overall fire protection picture. While seldom used, the ability to have one agency back up another can play a crucial role in reducing loss of life and property. Resolution of any issues surrounding the mutual aid agreements would enhance area fire protection services.
691	The finding of no impact on Cheyenne Fire District No. 2 is questioned.	There will be a potential need for two volunteer firefighters in Fire District No. 2, but not for equipment or facilities. An impact that creates a potential demand for a small number of volunteers to maintain the existing volunteer-to-population ratio is not an impact that can be mitigated.
692	Increased population and activity will increase fire and rescue operations of all types in Laramie County.	Project impacts are based on projected increases in resident population. In Laramie County, these are confined to the City of Cheyenne and the areas served by Laramie County Fire Districts Nos. 1 and 2. Each of these agencies is dealt with in detail in Section 3.9 of the Final Jurisdictional EPTR. Population and activity increases (as measured by vehicle miles traveled as an indicator of increases in automobile accidents) in rural Laramie County are projected to be negligible with essentially no effect on rural fire districts. Projections are based on existing service levels to allow maintenance of insurance services office ratings.
693	Funding for the proposed fire protection mitigations for Laramie County was not identified. Additional suggestions are made.	Possible funding sources for mitigation measures have not been determined at this time. Annexation by Cheyenne of a portion of the area served by Laramie County Fire District No. 1 is possible but, depending on just where in the District growth occurs, may or may not be a possible

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		solution to the impacts on the District from the project. If by "changing the mutual aid agreements" the commenter refers to regular assistance from other fire protection agencies, such entities are free to agree to assist each other in whatever manner they choose. It is unclear, however, if an agreement for unilateral assistance (meaning primarily to District No. 1 from other agencies) could be entered into without some sort of reimbursement, though such an arrangement might be responsive to the District's needs.
694	Acceleration of the planned fire station in South Cheyenne will restrict expenditures for other needs.	The Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, outlines funding information. For information concerning expenditure patterns, please refer to the Public Finance Section of the FEIS.
695	Project impacts on fire protection should be analyzed based on specific settlement patterns rather than population growth alone in Cheyenne.	Geographical settlement pattern information for areas within Cheyenne is part of the analysis contained in the FEIS. For further information, please see Section 3.9.1 of the Final Jurisdictional EPTR and Section 3.5.4 of the Final Public Services and Facilities EPTR.
696	The Cheyenne Fire Chief is satisfied with the fire protection section of the Draft Jurisdictional EPTR.	Noted.
697	The demand for emergency medical services should be projected based on the number of workers rather than the inmigrant population as a whole. Construction-related accidents at sites located in remote areas of Platte County will impact emergency medical services facilities and personnel.	Potential injuries by workers at the missile construction sites may be a problem for the rural ambulance services and are included with the analysis of emergency medical services. For further information, please see Section 4.9.2.3 of the Final Jurisdictional EPTR.
698	Demand for emergency medical services should be projected based on the number of workers in the county rather than the inmigrant population as a whole. Construction-related accidents at sites located in remote areas of Goshen County will impact emergency medical services facilities and	Potential injuries at the missile construction sites may be a problem for the rural ambulance services and are included in addition to EMS services for the entire county. The rural ambulance services may experience some difficulties in locating the missile sites in a

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	personnel.	timely manner. For further information, please see Section 5.9.2.3 of the Final Jurisdictional EPTR.
699	The accountability of the Laramie County Public Health Department satellite clinic staff must be clarified.	The text is changed to indicate that the clinic could be placed under the jurisdiction of the Nursing Services supervisor. Please see Section 3.10.3.4 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
700	Correction should be made in the description of the Laramie County Public Health Department programs.	A revised description of the Public Health Department was incorporated for the final analysis. This information is included in Section 3.10.2.1 of the Final Jurisdictional EPTR and Section 2.6.5.1 of the Final Public Services EPTR.
701	Because the hospital service area for Laramie County hospitals includes parts of southeastern Wyoming, western Nebraska, and northern Colorado, the impact projection based only on Laramie County population growth is understated.	The utilization of Laramie County health services by residents of other counties in the service area as well as those Laramie County residents who may require specialized services outside of the service area is considered in the analysis of impacts. The demand from patients from outside Laramie County is only about 10 percent of hospital utilization, the majority of which is for tertiary care services. Other hospital facilities and services in the region are adequate for more routine, general, and acute care. Therefore, it was considered that impacts on Laramie County hospitals by residents of other counties in the service area are minimal.
702	The analysis of impacts on health care in Laramie County is inadequate.	A more detailed analysis of impacts on health care is included in Section 3.10.2.3 of the Final Jurisdictional EPTR and Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
703	Specific emergency medical transfer requirements at the Deployment Area should be estimated.	The construction industry has a relatively high rate of injury, and will result in an increase in calls. Depending on the severity of the injury, the rural ambulance services, A-1 Ambulance, or the Military Assistance to Safety and Traffic (MAST) helicopter will be dispatched. As indicated by A-1 Ambulance, their third, presently on-call, vehicle may be used as a full-time vehicle if

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		demand warrants. They presently have adequate staff available for this. The concern that rural ambulance services would not be adequate to handle serious trauma patients is apparently not a serious problem. Depending on the severity of the injury or illness, the A-1 Ambulance service will respond to serious trauma calls throughout Laramie County, and also 15 miles into northern Colorado, Albany County, and portions of Platte and Goshen counties, if necessary. Also, the MAST helicopter would be available for severe injury cases. The hospitals in both Wheatland and Torrington have 24-hour-staffed emergency rooms.
704	The Laramie County Public Health Department must have the staff capability to respond to changes in service demands throughout all phases of the project, including the potential bust phase.	The mitigation for health planning coordination during pre-project and impact phases could be continued through the operations phase to assure service responds to changes in demand.
705	As impacts were projected using existing ratios of health care providers to population, impacts on specific types of services (e.g., obstetrics) may have been underestimated due to differing demographic characteristics.	A more detailed breakdown of health services demand by age and sex of the inmigrant population was performed in the final impact analysis. The results of the analysis are presented in Section 3.10.2.3 of the Final Jurisdictional EPTR and Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
706	The demographic characteristics of inmigrants must be provided to health care agencies and planners to ensure that necessary services will be provided.	The socioeconomics model provided data on worker accompaniment rates, family composition, and age breakdowns for the total inmigrant population. These are included in the more detailed assessment of health care impacts. For further information, please see Section 3.10.2.3 of the Final Jurisdictional EPTR and Section 3.5.5.4 of the Final Public Services and Facilities EPTR.
707	The impact on health care facilities at F.E. Warren AFB will create a need for facility expansion. Therefore, a mitigation suggestion would be for the Air Force to ensure that expansion plans are implemented.	The F.E. Warren AFB hospital would be impacted if expansion of services were not implemented. This is discussed in Section 3.4.5.3 of the Final Jurisdictional EPTR and Section 3.7.5 of the Final Public Services and Facilities EPTR.
708	Baseline information on human services staffing was inaccurate.	The updated information provided by the agency director was reviewed and is included in Section 3.10.1 of the Final Jurisdictional EPTR and

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		Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
709	Additional staffing needs should be projected for the human service agencies.	These additional needs were evaluated and are included in Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
710	Additional human services staff will be required for which specific agency?	Additional staff will be required for several human service agencies. Specific staffing allocations can be found in Section 3.10.1.6 of the Final Jurisdictional EPTR.
711	In general, human services staff increases seem unrealistic. Fractions of staff members are a problem.	Forecasts are based on an extension of current staffing levels into the future. Two additional staff members were recommended for the Mental Health Center. The fractions were given because they are the result of calculations, and because rounding would not allow comparisons of levels of need. These fractions of full-time equivalent staff can be interpreted as the need for part-time staff, or rounded upward in some cases to a need for a full-time staff addition. For further information on each agency, please see Section 3.5.6.4 of the Public Services and Facilities EPTR.
712	Volunteers are a limited resource. More paid staff may be needed. It is dangerous to project that additional human services demands will be met by volunteers.	The question of volunteers providing assistance to human service agencies is complex, as their number fluctuates, along with their roles and responsibilities. Some agencies provide services entirely through volunteer assistance; others use volunteers in only minor roles. An increase in employment in an area will not necessarily reduce the number of volunteers, because people who take employment may have different motivations and interests from those of volunteers. For example, some spouses may wish to contribute to their community but not want full-time obligations because of family responsibilities. The inmigrant-spouse population may be available for volunteer work as they have been in other impact areas, particularly if newcomers are encouraged to participate. An analysis of the Volunteer Information and Volunteer Action Center is

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		included in Section 3.10.1 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
713	A full-time staff member will be needed by the Southeast Wyoming Mental Health Center during the peak years to handle psychiatric emergencies.	The Draft Jurisdictional EPTR did indicate the need for an additional emergency mental health worker as discussed with the Center's representative. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
714	Discussions on the recommendation of potential human services staffing is not helpful. Also, per capita needs will not necessarily remain the same.	The numeric fractions were provided because these were the exact results of the calculations. To round to whole numbers would neither provide an accurate picture of the differences in the forecast increases nor provide an indication of how much impact might be expected under these conditions. Also, increased demands can be met through overtime, where it is desirable or possible, with part-time employees, depending on the circumstances. The current conditions are as good an indicator of the future as any other assumptions. A range of impacts estimates potentially disproportionate increase in future needs related to the project. Monitoring the agencies in the future could more accurately show actual changes in demand.
715	It is recommended that one alcohol intervention specialist be added to the Alcohol Program at the Southeast Wyoming Mental Health Center in the peak impact years.	The staffing impacts were reassessed and an additional staff person was recognized as an unmet need. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
716	The Laramie County Division of Public Assistance and Social Services facility was not included in the capacity and condition analysis in Wyoming.	This facility has subsequently been analyzed. More detail is provided on the Division of Public Assistance and Social Services facility in Appendix D of the Final Jurisdictional EPTR.
717	The capacity of Grandma's Safe House and the Community Center for Domestic Violence was incorrectly presented in the report.	Additional information on these facilities capacities and utilization rates can be found in Section 3.10.1 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services

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		and Facilities EPTR.
718	Additional human services staff projections in Laramie County will lead to a need for additional space.	The need for additional space is noted in Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
719	Additional space needs should be projected for six human service agencies in Laramie County.	These additional needs were evaluated and are included in Section 3.10.1 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
720	Inaccurate baseline information on human services staffing, facilities, and programs in Laramie County was presented in the Draft Jurisdictional EPTR.	This information was confirmed with each agency and corrections were made where appropriate. Please see Section 3.10.1.4 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
721	Sources of funding for the human service agencies in Laramie County are not identified.	The Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment provides information on funding sources for affected agencies. For further information, please see 3.10.1.4 of the Final Jurisdictional EPTR.
722	When facilities are already inadequate, perception of impact will be greater than for human service agencies whose facilities are not now str ined.	Any impacts are more difficult for an agency to manage if they cannot currently meet demand. The increment of unmet demand should be taken care of both currently and in the future under baseline future and project impact conditions.
723	The Draft Jurisdictional EPTR does not address qualitative aspects of Peacekeeper impact.	The study process included a review of several qualitative issues related to the project. These issues were also considered in determining the approach to making projections. Other related aspects were considered further in determining impact multipliers for many of the agencies. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
724	The Draft Jurisdictional EPTR did not project future programmatic changes or reflect impacts of transients on Community Action.	The Draft Jurisdictional EPTR does not include recommendations for program changes. The number of transients expected with the project have been

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		estimated and considered in developing the forecasts. For further information, please see Sections 3.5.6.4 and 3.10.1.6 of the Final Jurisdictional EPTR.
725	There is great concern regarding the abuse of alcohol in the area.	The issue of alcohol abuse, particularly in regard to domestic violence, is considered in the social well-being sections of the FEIS. In addition, the human services section evaluated a number of agencies that deal with alcohol-related problems, including the Department of Public Assistance and Social Services programs, the Alcoholic Receiving Center, the Cheyenne Halfway House for Alcoholics, the Southeast Wyoming Mental Health Center, the Community Center on Domestic Violence, and Grandma's Safehouse.
726	The human services section is inadequate. Each section should contain separate mitigations. Mitigations should be more detailed and specific to impacts. The methodology used to project impacts is questionable.	The methodology involved a determination of the population currently served in terms of its age and sex characteristics where this data was available. This information was then extrapolated to the baseline future population and the future project population age and sex cohorts. If no specific distinguishing characteristics were discernible for an agency's clientele, the population as a whole was used as the basis for determing future clientele. The current ratio of staff-to-clientele and ultimately to population (whether age and sex-specific or total population) was used for both baseline future and project populations. This approach was used because the current situation is the most likely to hold (considering all of the variables involved such as funding sources and legislative decisions) in the future; and demand could actually fall as well as increase for either the baseline or project future populations. A representative of the Department of Public Assistance and Social Services indicated that demand for Aid to Families With Dependent Children actually fell in Casper, as some single-parent women moved in with construction workers, although demand did rise somewhat during the bust phase. Other researchers working in the area have also indicated that in some instances, demand rates did not reach the

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		rate of population increase. In addition, because demand for human services often reflects many factors, and because population increases are expected to be relatively small in Laramie County, the existing service ratio was considered the best judgment for this analysis. However, because of the possibility that project impacts could be greater than expected, a range of impacts are presented in the final document, with the existing ratio as the low end and a disproportionate ratio to represent a higher problem incidence with project impacts as the high end. Some of the services in the county cannot meet their current demand. The effects of this situation on future populations are also discussed, in the final document, qualitatively and quantitatively. The impacts are specified and their respective mitigations presented in the Final Jurisdictional EPTR. Mitigation measures are presented separately and are more detailed for the Final Jurisdictional EPTR.
727	The references to increased staff needs for Substance Abuse Programs and Domestic Violence were not clear as to where these people would be and how they would be paid.	The staff needs associated with Substance Abuse and Domestic Violence programs, and a range of potential impacts have been included in the final analysis. Costs associated with project impacts are contained in the Fiscal Impact Analysis prepared by the Department of Defense Office of Economic Adjustment. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
728	The City of Cheyenne Mayor's Impact Team recommends that monitoring programs be included for each human service agency.	The monitoring program mitigation is presented for each human service agency in Section 3.7.6 of the Final Public Services and Facilites EPTR.
729	A human services needs assessment must be included in mitigation measures. Also, measures must be more specific and in greater detail in order to work.	The needs assessment mitigation was presented in the social well-being section of the report and is included among the mitigation suggestions for human services in the final document. Agency needs will also be provided in more detail. The specifics of a monitoring and response program will be determined in the Fiscal Impact Analysis being conducted by the Department of Defense

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		Office of Economic Adjustment.
730	Short-term monitoring of human services must be based on a needs assessment to be effective. Funding must be available for quick response to needs. Long-range monitoring is also essential.	These suggestions have been taken into consideration in development of presented final mitigations. For further information, please see Section 3.10.1.8 of the Final Jurisdictional EPTR and Section 3.7.6 of the Public Services and Facilities EPTR.
731	The Draft Jurisdictional EPTR neglects the impacts of transients on the Laramie County community.	Projections of transient population and the resulting impacts on community services are provided in Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
732	The baseline data on Grandma's Safe House and the Community Center on Domestic Violence contained inaccuracies on the budget.	The information has been corrected and can be found in Section 3.10.1.4 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
733	How should the Salvation Army expansion be funded?	The Salvation Army is currently in the process of renovating the facility into which it recently moved. Materials for the renovation are being purchased through thrift store sales and a small amount of United Way funding. Labor is being provided by volunteers. The current renovation does not include the part of the facility that will be used for lodging. The Director hopes to be able to find monies to renovate the remainder of the facility.
734	The Draft Jurisdictional EPTR does not adequately take into account the disproportionate demand for human services of the inmigrant population in Cheyenne.	The evidence regarding the relationship between rapid growth and the incidence of social problems is limited. Research in this area is not strong and is often conjectural, although some trends for certain problems have been indicated for small towns that have experienced large influxes of population. Although inmigration factors are conservative, the size of the existing population in Cheyenne and Laramie County and the small increment of growth related to the project are very different elements from those found in typical boomtowns. Because of this, and because even in boom areas, social problems and the resultant demands on agencies do not

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		necessarily increase at rates greater than the population growth rate, the modified per capita approach is utilized in the forecasts. A multiplier designed to estimate a range of possible disproportional increases is used for forecasting staff increases for several agencies. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
735	The listing of unmet human service needs is incomplete. There are many more agecies with unmet needs than those mentioned.	The specific needs of the agencies as indicated by the agencies representatives were discussed under each of their respective sections in the Draft Jurisdictional EPTR. The other needs were indicated by these same representatives regarding problem areas in human services in general in the community. The agencies contacted include the major service providers as well as several others.
736	Human service agencies are now operating at capacity and will not be able to meet future baseline needs.	Given the often-stated condition of many current services, several changes appear necessary at this time. In the Final Jurisdictional EPTR the level of capacity each agency is currently operating at is taken into consideration. Where information on unmet needs is available from agency representatives regarding both their agency and the community as a whole, this information is provided.
737	Why are no mitigation measures proposed for the impact situation at F.E. Warren AFB?	Mitigation measures are now included in the FEIS and are presented in Section 3.4.4.4 of the Final Jurisdictional EPTR.
738	There is no reference made to impacts on human services during the possible "bust" cycle.	The possible post-construction period was addressed in the discussion of the County office of the Department of Public Assistance and Social Services. A major "bust" situation is not anticipated; however, this possibility is addressed in the process of developing impact multipliers.
739	The assessment methodology for impacts on human services in Laramie County was inaccurate. The impacts on local residents and their unmet needs	Impacts can occur to both residents and agencies. Presumably, concerned agencies will alleviate many difficulties in a community. The agencies

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	should be included along with human service agencies in the methodology. The primary impacts are on residents are on while secondary impacts are on human service agencies.	represent the institutional side/response side to demand for services. The following approach was pursued: a large number of services, as proposed by local service providers and review groups, were surveyed and presented. The future delivery capacity of these services were forecast taking into account their current delivery levels and unmet needs. A range of possible impacts were developed for the services that were anticipated to have variable demands. For further information, please see Section 3.1.6.2 of the Final Public Services and Facilities EPTR.
740	Numbers and demographic characteristics of human services clientele for the Southeast Wyoming Mental Health Center were incorrectly stated in the Draft Jurisdictional EPTR.	The agency's clientele data have been modified. For further information, please see Section 3.10.1.4 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
741	What is the basis for the assumption that day care centers serve primarily two-income families?	The assumption is based on the importance of child care to families with both spouses working. In addition, single parent usage has been included in the final analysis.
742	A community needs assessment must be undertaken to assure that the monitoring system works, and to determine current service deficiencies.	Current shortfalls in the community may be assessed as part of a monitoring program, should that be selected as a mitigation.
743	The COMEA shelter's high summer use rate may not be a continued trend in the future, as early summer weather was bad in 1983. Also, the agency has been open less than one year.	Many conditions may affect seasonal and total yearly utilization rates. These relationships will not be understood until they are monitored over a period of time.
744	The Draft Jurisdictional EPTR did not address the issue of human services which are not provided to all those who need them. The Safe House, for example, experiences increased utilization partially attributable to higher visibility and accessibility so that greater numbers of those in need came to use the service.	The issue of providing services to all who need them is an existing one that should be addressed regardless of the project. The increase in the utilization rate at the Safe House is not necessarily a reflection of services not being provided to all who need them. In fact, services were available for these people. The increase in the rate is complex and probably occurred for several reasons as increased awareness of the existence of the Safe House, increased acceptability of using it and getting help for domestic violence problems, increased legitimacy or trust on the

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		part of community members, general changes in attitudes towards such issues, and increases in the actual occurrence of domestic violence. Similar increases in use rates have occurred in other communitites where Safe Houses were established, although there is a mathematical limitation to such increases. The use rate will stabilize at some point, although it may continue to rise for some time. Because the extent of this continuation is unknown, the current rate was used to forecast baseline needs. Obviously, major increases will create a more substantial baseline need. This situation should be monitored and appropriate community responses developed. Services should be provided before demand occurs, under both baseline future and project conditions. A multiplier was used to estimate a potential range of needs.
745	The Draft Jurisdictional EPTR projects numbers of workers but not accompanying families.	The forecasts noted are for total population including spouses and children. For inmigrant population forecasts, please see Section 3.1.1.4 of the FEIS.
746	Clientele will increase during the bust phase and will impact the Mental Health Center which is utilized by a high percentage of unemployed persons.	Because of the large numbers of local residents to be employed in the area and the availability of a major labor pool in the Denver area, the numbers of unemployed remaining in the Cheyenne area after the project should be relatively small. Also, construction is phased down for several years. This period of time allows unemployment to occur more gradually than it has in many boom communities. Unless other job opportunities are available in Cheyenne, persons in need of jobs are not likely to stay around. In fact, the experience in boom areas has been a sudden jump in mental health caseloads followed by a decline as population declines. Although a major "boom" or "bust" impact is not expected, a multiplier accounting for some variation beyond current per capita rates is used to provide a range of possible impacts.
747	The inmigrant population will have different human services needs from those of current county	This issue is addressed qualitatively in our discussion of impact clientele needs. In

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	residents.	addition, multipliers were developed to calculate variations in service demand from the inmigrant population. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
748	The Jurisdictional EPTR should address issues of increased human service agency demands due to inmigration of workers and job seekers.	A range of impacts were developed based on information derived from social service agency experiences in other impact areas. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Public Services and Facilities EPTR.
749	Monitoring increased demand for services cannot be effective to mitigate impacts on emergency services for the Southeast Wyoming Mental Health Center. Given the nature of psychiatric or substance-abuse emergencies, services must exist to provide care immediately upon demand.	Any service can be monitored and appropriate responses determined. While monitoring doesn't solve problems, it can be used as an early warning indicator. It is also evident that some problems currently exist with provision of the Center's emergency services. However, because of the central role of mental health and alcohol services in Laramie County, the importance of dealing with possible project-related cases is acknowledged. This issue, and the other recommended mitigations, were considered in development of the final measures presented for consideration. For further information, please see Section 3.10.1.8 of the Final Jurisdictional EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
750	The Draft Jurisdictional EPTR presented inaccurate information on volunteer staff at the City of Cheyenne Youth Alternative agency.	The information has been corrected and incorporated in Section 3.10.1.4.16 of the Final Jurisdictional EPTR and Section 2.6.6.1.3.16 of the Final Public Services and Facilities EPTR.
751	Optimum teacher-pupil ratios for Stride Learning Center should be addressed in the Draft Jurisdictional EPTR.	The teacher-to-pupil ratio for Stride Learning Center has been discussed with the program director. Suggestions regarding appropriate ratios are considered in the forecasts. For further information, please see Section 3.10.1.4.21 of the Final Jurisdictional EPTR and Section 2.6.6.1.3.21 of the Final Public Services and Facilities EPTR.
752	The use of volunteers must be considered an important element in human service delivery.	The need for volunteers is noted with regard to the relevant agencies. However, the new base-

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		line and inmigrant populations are expected to include new volunteers as well. Other areas impacted by such projects have experienced increased numbers of volunteers. This situation presents opportunities for nonworking spouses to participate in the community. Encouragement of volunteer activities on the part of newcomers, either project or nonproject-related, is good for the community and newcomers as well. well).
753	Current staffing levels for Youth Alternatives should not be used to project impact needs because the center is currently understaffed in Cheyenne.	The addition of one staff member could be called for under project conditions at current ratios of staffing. The current conditions and level of staffing are apparently considered to be acceptable to local officials. This same ratio was the basis for the forecast because it is the most likely condition to be reflected in the baseline future, barring any other information on likely future conditions. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
754	The volunteer human services should be quantified and funding sources identified.	The additional need for volunteer human services have been identified. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
755	The Draft Jurisdictional EPTR projects impacts on Human Services in Wyoming but does not suggest mitigations.	Further description and analyses of onbase human services are included in Section 3.4.4 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR, in addition to identified mitigation measures.
756	The Draft Jurisdictional EPTR indicates that human services facilities operating at capacity will continue to do so.	The existing short-falls in services were considered for most of the agencies including cases of facilities and staff operating at capacity. There is no basis for projecting that per capita services at these agencies will be increased under baseline.
757	Remodeling and use of the basement of Grandma's Safe House in Laramie County was recommended but	The costs of the expansion are noted in Section 3.10.1.4.8 of the Final Jurisdictional EPTR and

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	no consideration of costs was provided.	Section 2.6.6.1.3.8 of the Final Public Services and Facilities EPTR.
758	Several human services agencies were not analyzed in the Draft Jurisdictional EPTR.	Based on discussions with representatives of the *Coping Mechanisms Impact Team*, additional agencies are analyzed in Section 3.10.1 of the Final Jurisdictional EPTR and Section 2.6.6.1 and 3.5.6 of the Final Public Services and Facilities EPTR.
759	Inaccurate human services baseline information was presented in the Draft Jurisdictional ETPR.	This information was confirmed with each agency and corrections made where appropriate in Section 3.10.1 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
760	A survey should be undertaken to determine Laramie County residents' needs for human services to determine current unmet needs.	A needs survey is beyond the scope of this study. However, unmet agency needs and local shortfalls in services are analyzed in Section 3.1.6.4.6.1 of the FEIS and Section 3.5.6.1 of the Final Public Services and Facilities EPTR.
761	The expansion of Youth Alternatives facility will cost money, and require staff increases which were not indicated.	The additional number of youth forecast to be inmigrants is 67, about 6 percent over the baseline youth population. Even if the impact is double this number, it still amounts to only a 12 percent increase over baseline. This small proportion would not, of itself, cause major facility or organizational changes, although one additional staff person is recommended in the report if the clientele reach 1,200. It appears that increased local support is necessary currently, and also will be necessary in the future to deal with existing and future demand without the project.
762	The existing capacity and staff of the Safe House have been incorrectly stated. Impacts on this agency should be better analyzed, as there may be a high incidence of spouse abuse under future baseline and with project conditions.	The Safe House capacity and staff information has been reevaluated and certified in the final analysis. Detailed projections of impacts on the Safe House were made with a multiplier applied to inmigrant population to account for potential disproportional impacts from the incoming population. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.

7.2.6 PUBLIC SERVICES AND FACILITIES

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763	Human services funding sources must be assessed to determine the needed funds.	The Fiscal Impact Analysis, prepared by the Department of Defense, Office of Economic Adjustment provides details on funding.
764	The impact analysis does not include multipliers to account for the disproportionate utilization of human services for youth due to the project.	In the absence of better information to quantify disproportionate impacts on youth, the current condition forecast was considered to be as likely to hold for Cheyenne as any other conditions. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 3.5.6.4 of the Final Public Services and Facilities EPTR.
765	The Draft Jurisdictional EPTR implies incorrectly that there are no unmet human services needs in the City of Cheyenne. The unmet needs should be detailed.	These needs have been more fully addressed in the final analysis. For further information, please see Section 3.10.1.6 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
766	The current service ratio for the Attention Home was utilized to project future need even though existing services are stated to be inadequate. The inadequate service ratio should not be used as a basis for projections.	The Attention Home is constantly at capacity. To account for the potential for disproportional demand, an impact multiplier has been used in the final analysis. As the agency operates at a capacity, no accurate forecast can be made for the baseline future without a better estimate of demand. An entirely accurate measure of future demand would be possible only if all current demands were met. This issue is clarified in Section 3.10.1 of the Final Jurisdictional EPTR. A monitoring program would indicate what the potential level of demand would be in both the baseline and with project futures.
767	There is no reference to prevention programming in the human services area.	Prevention programming has been initiated by the State of Wyoming. In response to the state's application to Congress, funds have been made available for planning purposes.
768	The figures for referrals into the program are percentages and not actual numbers of referrals.	The figures are noted as percentages in Section 3.10.1.4 of the Final Jurisdictional EPTR and Section 2.6.6.1 of the Final Public Services and Facilities EPTR.
769	Does the increase in demand forecast for the Attention Home indicate demand or persons served	When existing waiting lists could be identified, these were incorporated into the demand forecast.

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	regardless of level of need?	Because the Attention Home is operating at capacity, the 6-percent figure is useful only for comparative purposes, as an extension of the current inadequate situation into the future. Also, the impact multipliers developed provide some estimate of disproportionate demand. Finally, an effective monitoring program would provide a more accurate picture of demand over time, so that actual rather than estimated demand can be determined on an ongoing basis.
770	While there are a number of unmet needs at the F.E. Warren Human Services Agencies, and a resulting spillover use of services in the community, no mitigation measures are suggested. This appears inadequate.	Mitigation measures for impacts on human service agencies at F.E. Warren AFB are presented in Section 3.4.4.4 of the Final Jurisdictional EPTR.
771	The project will have an impact on the Wyoming Archives Museums & Historical Department due to the need to catalogue project-related documents.	Additional documents are generated as a result of the project. However, the additional requirements for information handling by the State Archives should not be excessive.
772	Impacts on the Platte County Road and Bridge Department should be assessed based on specific project demands, such as maintenance of damaged county roads.	These impacts were analyzed based on transportation data on miles traveled in connection with project activities, and are incorporated in the Final Transportation EPTR.
773	The Goshen County shop and equipment are inadequate, especially in the road and brige department.	This information has been corrected. For further information, please see Section 5.1.1.3 of the Final Jurisdictional EPTR.
774	The County will have difficulty meeting baseline future needs for equipment.	This is noted in the final document. However, this is a baseline need not related to project impacts.
775	Impacts on the Goshen County Road and Bridge Department should be assessed based on specific project demands, such as maintenance of damaged county roads.	These impacts were analyzed based on transportation data on miles traveled in connection with project activities, and are incorporated in the Final Transportation EPTR.
776	Civil defense facilities, and equipment were not fully analyzed.	The analysis is refined in Appendix D of the Final Jurisdictional EPTR.
777	The Draft Jurisdictional EPTR incorrectly described existing conditions of Civic and County	This information has been corrected. Please see Section 3.1.1 of the Final Jurisdictional

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	facilities and equipment.	EPTR and Section 2.6.7 of the Final Public Services and Facilities EPTR.
778	The Draft Jurisdictional EPTR presents an inaccurate projection of 911 expansion in the year 1995.	The feasible time period for expansion of the 911 Center facilities has been reassessed. Expansion of the 911 system is not projected at the present time. For further information, please see Appendix D of the Final Jurisdictional EPTR.
779	The Draft Jurisdictional EPTR incorrectly states that no expansion of the Laramie County Road and Bridge Department will be needed during the 1983-1992 period.	The cited statement from Section 3.1.1.2 of the Draft Jurisdictional EPTR referred to baseline, without project, conditions. The section on project impacts stated that "capital equipment for road and bridge maintenance could receive substantial increases in usage and attendant maintenance requirements during the construction phase in Laramie County." Additional detail on needs are provided in Section 3.1.1.3 of the Final Jurisdictional EPTR and Section 3.5.7.9 of the Final Public Services and Facilities EPTR.
780	The Laramie County Civil Defense Facility would not be adequate in the case of a disaster or emergency. Its adequacies should be evaluated.	The potential for a future nuclear emergency is beyond the scope of this study.
781	Mitigations such as joint city/county engineering and zoning offices in Cheyenne are recommended as additional possibilities. Mitigation requiring use of overtime is criticized.	Mitigations presented in the Draft Jurisdictional EPTR have been modified. Overtime is on a menu of mitigation options available for use. For further information, please see Section 3.1.1.4 of the Final Jurisdictional EPTR and Section 3.7.7 of the Final Public Services and Facilities EPTR.
782	Mitigation to relocate Laramie County shop buildings is supported and suggestions for suitable locations are made.	Noted.
783	The study neglects the description of the Planning Department staff for both the City of of Cheyenne and Laramie County.	Since the Planning Department staff is a joint city/county staff, they were not included in the listing of the city staffing. The description of the City and County Planning Departments is included in Appendix A of the Final Land Use EPTR.
784	The Draft Jurisdictional EPTR did not assess accurately the cost of additional general	The costs of project impacts on staffing is assessed by the Office of Economic Adjustment in

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	government staff needed due to project impacts.	the Fiscal Impact Analysis.
785	The City/County Planning office was inaccurately identified as the City Planning Office.	This is corrected in Section 3.1.1 of the Final Jurisdictional EPTR and Section 2.6.7.1 of the Final Public Services and Facilities EPTR.
786	More detail is needed on the 911 Emergency Center staffing and facilities.	More detail on the 911 Emergency Center is contained in Appendix D of the Final Jurisdictional EPTR.
787	A critique of the general government services regarding staffing, space, and equipment is offered.	During the data gathering period, certain data were gathered regarding general government offices and peak activity times. The County Treasurer staffs up annually to provide services during December and January for annual license plate renewal. State legislative action is the only known means available to prevent this annual occurrence. During the winter months in years past, County Road and Bridge Department maintenance and snow removal demands have exceeded capacity to respond. This has also been true during other times of the year, especially during abnormally inclement weather conditions. The County Clerk's office has also experienced stress periods for various reasons and recently added two more employees. An important basis for general government impact assessment was the consideration of the management capacity of the City of Cheyenne and Laramie County general governments to respond to the demands of the Peacekeeper project. Projection by use of the 1983 ratio of population-to-staff represents an appropriate first level prediction of demand resulting from the Peacekeeper project. It is recognized that needs may vary substantially between offices. It should be pointed out that issues such as detailed projections of need by office, department, or subdepartment, and the viability of mitigation options such as overtime, workload, and others can be found in the Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, but in addition, this study also investigates the need for increased employment during the readjustment period. Regarding city staff and baseline growth,

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		with the exception of 1979 and 1980, in which staff increases for a new fire station and other nongovernmental staff increases were made, total staffing for the City increased by about 10 persons per year or approximately 2.5 percent per year. Based on discussions with City officials and on other data, staffing for general government offices was expected to increase at a rate necessary to maintain existing service levels but slower than prior trends. The projection of staffing increase based on 1983 levels was, therefore, considered to be a reasonable projection. Demand for space was projected based on staff needs and work space requirements.
788	More information is needed on the types of general government services to be provided by Laramie County, to the South Cheyenne Water & Sewer District.	A review of available published data sources and an in-depth interview with the Laramie County Clerk failed to reveal any problems regarding the provision of general government services to South Cheyenne Water & Sewer District residents. In addition, over three-fourths of the general government services provided by the County are provided by the elected officials and staffs of the County Clerk's Office, the County Assessors's Office and the County Treasurer's Office. All indicators are that services provided by these offices are presently adequate. With the temporary addition of staff and space during the project-related growth period of 1985-1992, provision of general government services to South Cheyenne Water & Sewer District residents should remain adequate. It should be noted that failure to provide the necessary increases in staff and space, or equivalent increases in efficiency, would result in the lowering of general government service levels for all County residents. Section 3.1.1.1 of the Final Jurisdictional EPTR lists those categories of Laramie County government staffing which were included in the determination of general government employment.
789	The facilities survey did not assess the Cheyenne Board of Public Utilities staff, space, or equipment.	Analysis of staff and equipment is included in the Final Utilities EPTR. Facilities are analyzed in Appendix D of the Final Jurisdictional EPTR.
790	The basis for projections of additional general government space is not provided in the Draft	The multiplier of 125 sq ft per employee is an accepted architectural standard. It is inclusive

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	Jurisdictional EPTR. The multiplier for space per employee should be documented.	of employee work areas and circulation space (hallways), but does not include space such as stairwells or boiler rooms.
791	If the city vacates Hangar No. 101 the space will have to be replaced, necessitating additional construction or renovation of existing buildings.	The decision to vacate Hangar No. 101 and the timing of this action is a policy decision of the city. The need to vacate the facility is not project-induced. Therefore, given no existing local alternatives available, information on cost, timing, and location of new facilities is beyond the scope of this project.
792	The Draft Jurisdictional EPTR statement that no changes in City of Cheyenne general government capital equipment needs are likely is not well supported.	Additional detail on capital equipment increases is provided in Section 3.2.1.3.4 of the Final Jurisdictional EPTR and Section 3.5.7.10 of the Final Public Services and Facilities EPTR.
793	Impacts on general government are understated because the projections do not include the effect of weekly commuters.	The impact of weekly commuters is included in the assessment of general government staffing impacts. For further information, please see Section 3.1.1.3 of the Final Jurisdictional EPTR and Section 3.5.7.9 of the Final Public Services and Facilities EPTR.
794	The impact on general government staffing in Laramie County will be greater than projected.	The projection of a staff increase was based on maintaining the 1983 full-time equivalent staff-to-population ratio for general government staffing. This ratio was derived from the estimated 1983 Cheyenne population and full-time equivalent general government staff. General government employment is a combination of both fixed positions (elected officials, appointed positions, and other employees whose positions are relatively insensitive to population changes) and variable positions, the number of which is directly related to population, number of employess, amount or space, and/or other variables which are sensitive to population. Since nearly all general government employees were included in the total, and no changes in the population-to-employment ratio were made to account for increases in efficiency, the use of a multiplier is a reasonable first-level determination of full-time equivalent general government employment demand due to the Peacekeeper project.

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		For the most part, temporary increases in employment would be required for clerical and general office type skills. However, for certain positions skills would be required which are generally more difficult to obtain, especially in the temporary market. For these positions, private enterprise support may need to be obtained to fill the need. In addition, the number of persons employed may be greater than the full-time equivalent demand due to the relatively large number of offices and departments potentially affected.
795	Use of a formula for projecting general government impacts is not acceptable without consideration of possible special service multipliers.	The impact assessment methodologies have been evaluated and revised where appropriate. For further information, please see Section 3.1.1.3 of the Final Jurisdictional EPTR and Section 3.5.7.9 of the Final Public Services and Facilities EPTR.
796	Correct the inaccuracy in general government description of Platte County.	The information has been corrected in Section 2.1.6.2.7.4 of the FEIS, Section 4.1.1.1 of the Final Jurisdictional EPTR, and Section 2.6.7.4 of the Final Public Services and Facilities EPTR.
797	The Laramie County Community College Library funding source was inaccurately identified.	This is corrected in Section 3.1.4.1.2 of the Final Jurisdictional EPTR and Section 2.6.8.1 of the Final Public Services and Facilities EPTR.
798	The peak-year impact needs for books and staff are expenditures which the Laramie County library system will not be able to absorb.	The Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment, assesses detailed costs of impacts associated with the project.
799	Based on experience in other Wyoming impact communities, project-related impacts on libraries caused by the inmigrant population are likely to exceed impacts caused by normal population growth. Impacts on library services will probably be greater than indicated.	Given the demographic characteristics and degree of population change experienced in other Wyoming impact communities, the experience of libraries in these areas is not applicable to the impact of the Peacekeeper project on the City of Cheyenne of Laramie County. For example, Rock Springs, Wyoming, almost tripled in size in seven years. The impact population as a result of the Peacekeeper is definitely not of this magnitude.
800	As a major portion of the inmigrant population will not be direct base employees, library	The analysis of library services and facilities includes service expansion at the Laramie County

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	expansion would be more appropriate in the community rather than on base.	public library to meet baseline future and project inmigrant population service demands. The future library service demands were projected at existing service levels for the baseline future population and at Wyoming State Library Standard levels for books and staff provision for the project-related population.
801	Mitigation measures proposed for impacts on library services in Laramie County are inadequate.	More direct mitigation measures such as the hiring of additional personnel and purchase of additional books to meet inmigrant population demands have been presented. Those mitigations that were presented are, however, commensurate with the magnitude of project impacts on the Laramie County Library system. For further information, please see Section 3.1.6.6.8 of the FEIS and Section 3.1.4.4 of the Final Jurisdictional EPTR, and Section 3.7.8 of the Final Public Services and Facilities EPTR.
802	Will the F.E. Warren AFB library be tied to the State computerized library network?	According to the State Librarian, the Base Library will not become part of the statewide circulation system. The Base Library currently does provide periodicals requested through the Inter-Library Loan system, and its periodicals are included in the State's Union List of *Periodicals; however* books held by the Base Library are not included in the system.
803	The Draft Jurisdictional EPTR inaccurately describes the remodeling of the old Albany County Library as the only major capital facilities improvement for the City of Laramie. There are no definite plans to further remodel the old library. Also, there are plans for capital expenditures in other areas and for other facilities.	Noted. Albany County is no longer in the Public Services Region of Influence; there is no impact population allocated for this jurisdiction.
804	The impact from the project upon the Wyoming Department of Labor will be minimal based upon the Draft Jurisdictional EPTR.	Noted.
805	Comments of the Southeast Wyoming Mental Health Center, the City-County Health Unit, and the Cheyenne-Laramie County Regional Planning Office, disagree with baseline assumptions and areas of	The analyses of these agencies have been re-evaluated in light of their comments. Responses to specific comments of these agencies are addressed individually.

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	emphasis.	
806	Laramie County has gained from the evaluation of resources and needs of the county.	Noted.
807	The only method to calculate the increase in necessary monies for the Cheyenne Weed & Pest Department is to correlate, via percentage, the upward population number with exigent funds.	Noted.
808	The report does not adequately treat impacts of inmigration on Nebraska communities with a small existing population base.	Population impacts on communities in Kimball, Scotts Bluff, and Banner Counties have been assessed in Sections 7, 8, and 9 of the Final Jurisdictional EPTR.
809	Psychological effects on school children from Peacekeeper deployment are not addressed.	Please see Section 1.3.4 of the FEIS.
810	Law enforcement impacts such as demonstrations mentioned in the summary are not addressed in detail in the Nebraska counties. Costs of training, additional personnel, costs to the state if local agencies cannot handle particular situations are examples of issues not addressed.	No mention was made of this topic for the Nebraska counties because it was felt that the Cheyenne area, with its proximity to F.E. Warren AFB, is the more probable location of any such possible demonstrations. The recommendation for training law enforcement officers for the Laramie County Sheriff's Department and the Cheyenne Police Department in the context of crowd control for civil disturbances, has been included as a potential mitigation.
811	The Draft Jurisdictional EPTR did not include the services provided by the Nebraska State Patrol as supplements to law enforcement services in the Panhandle Region.	The incremental increase in population is not large enough to warrant additional staffing or equipment for state law enforcement.
812	Law enforcement impacts will be experienced in Nebraska due to the inmigrant population.	Impacts on provision of law enforcement services in Kimball, Banner, and Scotts Bluff counties were identified. For further information, please see Sections 7.1.2.3, 8.1.2.3, and 9.1.2.3 of the Final Jurisdictional EPTR.
813	The Kimball County Police force will experience impacts.	The impacts on Kimball County law enforcement have been reevaluated. For further information, please see Section 7.1.2.3 of the Final Jurisdictional EPTR and Section 3.5.2.15 of the Final Public Services and Facilities EPTR.

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814	The report incorrectly identifies the number of sworn personnel in Scottsbluff.	The information has been corrected in the Final Jurisdictional EPTR.
815	The costs of the mitigation of adding night court hours to handle the additional impact burden are not detailed in the document, nor is the responsible party for funding identified.	Revised mitigations for impacts on the justice system are included in Section 3.1.6.6.3 of the FEIS, and Section 3.1.3.4 of the Final Jurisdictional EPTR and Section 3.7.3 of the Final Public Services and Facilities EPTR.
816	Albany County will establish a County Court System effective July 1984.	Following revisions to the population projections and allocations, Albany County is no longer included in the Region of Influence for Public Services and Facilities.
817	The Draft Jurisdictional EPTR provided inaccurate caseload information on caseload statistics for the Albany County Courts.	The caseload per month figure was obtained from incomplete and in some instances questionable reports filed by the court and from interviews with the clerk and judges of the Court. Following revisions to the population projections and allocations, Albany County is no longer included in the Region of Influence for Public Services and Facilities.
818	There are four judges in Scotts Bluff County not two as reported in the Draft Jurisdictional EPTR.	Noted.
819	Typographical error in discussion of Scotts Bluff County Court caseload.	Noted.
820	St. Elizabeths Hospital was incorrectly identified as being located in Omaha. In reality, St. Elizabeth is in Lincoln, Nebraska.	Noted.
821	Scottsbluff has historically served as a regional medical center for the Panhandle of Nebraska. Therefore there will be impacts on Scottsbluff health care facilities given any increase in population in the region.	The project impacts on health services in Scotts Bluff County have been reevaluated. For further information, please see Section 8.14.2 of the Final Jurisdictional EPTR.
822	The costs of caring for increases in casualties from increased traffic or construction accidents are not addressed.	During the peak year of 1987, accidents would increase approximately 3.9 percent over baseline conditions. The increase in construction accidents can be found in Section 3.5.5 of the Final Public Services and Facilities EPTR and Section 3.10.2

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		of the Final Jurisdictional EPTR. Analysis of costs of injuries costs of injuries associated with the project have been addressed in the Fiscal Impact Analysis prepared by the Department of Defense, Office of Economic Adjustment.
823	The social service agencies in Scotts Bluff County such as Daycare, Family Planning, and the Office of Mental Retardation are projected to receive no impact based on Scotts Bluff County population; however, the report acknowledges that these agencies serve the whole panhandle region.	Impacts on Scotts Bluff County social service agencies have been provided in more detail, considering utilization of services by residents of the counties. Project-related impacts from the regional service area would only be attributed to a small percentage of potential uses from the inmigrants allocated to Kimball County (75 in 1988 and 300 in 1989), resulting in a negligible impact.
824	Some of the data presented for baseline conditions and impact projections for human services in Scotts Bluff County were questioned. An assessment of the financial impacts of increased demand on services was not included in the analysis.	This information has been verified and appropriate corrections made. For further information, please see Section 8.14.1 of the Final Jurisdictional EPTR. The Fiscal Impact Analysis concurrently under way contains a discussion of available funding sources.
825	Social services for Banner County are provided through the local office in Kimball. Therefore Banner County social service clientele are included in the Kimball County caseloads.	This information was verified and appropriate corrections made. For further information, please see Section 9.4.1 of the Final Jurisdictional EPTR.
826	Some of the data presented for baseline conditions and impact projections for Kimball County were questioned. Transient job-seekers will have an impact on social service caseloads which should be accounted for.	This has been considered in the final analysis. Estimates in number of job-seekers were made and incorporated for the areas where it is anticipated that transients will create impacts. For further information, please see Section 7.7.1 of the Final Jurisdictional EPTR and Section 3.5.6.6 of the Final Public Services and Facilities EPTR.
827	There is no discussion of the additional burdens of transients on Kimball County social service agencies. This is especially important as these transients must be served by county funds under state law. Accurate numerical and fiscal projections are therefore needed.	Problems associated with transients in Kimball County have been addressed in the final analysis. Only 24 transients are projected to be in Kimball at any one time in 1989. This low number for one year or less should not create serious impacts on social service agencies. For further information, please see Section 3.5.6.6 of the Final Public Services and Facilities EPTR.
828	The inmigrants associated with the project will create problems. Changes in general government	These potential impacts and changes necessary to meet additional public service demands of the

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	services in Nebraska will be required to accommodate the increased population.	inmigrant population have been addressed. For information, please see Section 7.1.1.3 of the Final Jurisdictional EPTR and Sections 3.5.7.15 and 3.5.7.16 of the Final Public Services and Facilities.
829	The description of the City of Kimball contains inaccurate information and requires corrections and additions as presented.	The corrections and additions have been made and incorporated in Section 7.2.1 and Appendix D of the Final Jurisdictional EPTR and Section 2.6.7.8 of the Final Public Services and Facilities EPTR.
830	The Laramie County Community College library impact is underestimated in the report.	The Laramie County Community College library director indicated that no problems are anticipated in meeting baseline future and project impact demands on services. Though the library experiences a great deal of public usage, the services and facilities have been adequate and expandable.
831	Appendix D contained unfavorable reports on education facilities in Kimball County.	These facilities have been reanalyzed and are contained in Appendix D of the Final Jurisdictional EPTR.
832	Appendix D inaccurately described the Goshen County Court house.	This is corrected in Appendix D of the Final Jurisdictional EPTR.

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833	To avoid an overextension of utilities systems for a short-term impact, utilities companies prefer a dispersal of housing onto existing platted lands.	The allocation of future land use development was based on the availability of water and sewer services, among other factors. Areas with these services were slated to develop before areas without such services.
834	Who is to pay for mitigations of sewage treatment and stormwater transport systems if expected project-related population growth does not materialize.	The expense of upgrading utility systems to service increasing baseline populations will be borne by the communities served. Upgrading of utility systems to provide for project impacts should only be undertaken if the expected population growth does occur.
835	Construction activities occuring on or near streams or involving hazardous waste disposal or the transport, handling or storage of hazardous wastes may require permits, licenses or approvals from the State of Nebraska.	Appropriate approvals, permits and licenses will be obtained as required by governmental agencies.
836	Utilities data sources for Nebraska are inadequate.	The persons contacted to obtain information concerning the utility systems in various communities included plant operators, maintenance personnel, city engineers, and other public officials. These persons were qualified to provide information on the subjects in question.
837	The Governor of Wyoming does not want any utility costs attributable to the project to be passed to existing rate payers.	Utility mitigation costs or the costs of increased provision of services to project-induced inmigrants can be recovered entirely by a) charging only those inmigrants for extentions or hookups of pipelines or cables, and b) charging those inmigrants for monthly service at then-existing rates. No general population rate increases will be necessary.
838	The effect of additional water demand on treatment systems, particularly in the Cheyenne, Laramie and Gering areas, could be substantial if present estimates of per capita water consumption are low.	The per capita water usage rates used and specific allowances for industrial, commercial, and municipal uses were derived from historical water records. It is not believed that future per capita water usage would vary substantially from what was indicated by the historical records.
839	The DEIS fails to identify existing water treatment and distribution systems and/or impact	These cities were considered in the study and no adverse impacts to the water treatment and

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	of the proposed actions in Gering, Scottsbluff or Kimball.	distribution systems were found. Please see Section 3.5.1 of the Final Utilities EPTR for details.
840	The computer model of the Cheyenne area distribution system needs to be fine tuned before conclusions can be made as to the strengths or weaknesses of the distribution system.	The water distribution system model for Cheyenne was originally calibrated against measured pressure data from 25 fire hydarants. Subsequent fine tunings were performed against specific-location pressure data recorded by the Board of Public Utilities and others. For further information, please see Section 3.2.3.1.3.2 of the Final Jurisdictional EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
841	Section 2.1.7.2.1 Water Treatment and Distribution fails to discuss water treatment for the Cheyenne service area.	Cheyenne's two water treatment plants for surface water are unique in the area, and hence did not require discussion in that section, particularly since the EIS document summarizes only those facilities with current or projected problems. All other communities use groundwater which requires little or not treatment. Cheyenne's treatment plants are described in the Utilities EPTR. For further information, please see Section 2.6.1.1.1 of the Final Utilities EPTR.
842	Water treatment, storage and consumption rates contained in Table 2.1.7-1 of the DEIS should be changed to reflect actual 1983 data.	Actual 1983 treatment, storage and consumption rates have been inserted in the table. For further information, please see Section 2.1.7.2.1 of the FEIS and Section 2.6.1 of the Final Utilities EPTR.
843	The Cheyenne Board of Public Utilities' own water demand projections should be included in the FEIS.	The Cheyenne Board of Public Utilities values have been discussed, but they were not used directly, because the demand analysis used was actually more disaggregated by neighborhood and water-user category and hence was more precise.
844	Maximum peak day water use with Peacekeeper impacts may be as high as 36.7 mgd.	New population projections suggest that the 1992 maximum day demand will be 36.03 mgd versus 35.88 under the baseline condition. These values were computed as 2.3 times the average day demands. For information, please see Sections 3.2.3.2 and 3.2.2.3 of the Final Jurisdictional EPTR and Section 3.5.1.2.1.1 of the Final Utilities EPTR.
845	The DEIS should analyze the impacts upon treated water storage reserves when peak demand	Such analysis was performed, and the WATSIM model indicated that existing water storage was adequate

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	exceeds peak capacity. The water storage reserves for emergencies and fire protection are seriously affected when they are used to make up the difference between peak supply and peak demand.	for meeting maximum day demands plus two simultaneous fire events totaling 5,310 gpm over at least a six hour fire event. For further information, please see Sections 3.5.1.1.1.2 and 3.5.1.2.1.2 of the Final Utilities EPTR.
846	The theoretical capacities of the Happy Jack and Roundtop treatment plants are reduced to a net capacity of 19 and 6.5 mgd respectively due to filter backwashing and the 1978 Safe Drinking Water Standards issued by USEPA.	The 20 and 8 mgd treatment plants have been simulated as functioning at 19 and 7 mgd, respectively, which are the net capacities conveyed to us by the Board of Public Utilities previously. For further information, please see Section 2.6.1.1 of the Final Utilities EPTR.
847	There are limited federal funds for wastewater treatment construction in FY 84, but all Cheyenne urban area 201 federal funding should be available by FY 85 if there are no congressional delays.	This updated information has been reflected in Section 3.1.7.4.2.1 of the FEIS, Section 3.2.2.2.2 of the Final Jurisdictional Utilities EPTR, and in Section 3.5.2.1.1.2 of the Final Utilities EPTR.
848	Mitigation costs and a schedule for enlarging the 12-inch sewer in Cheyenne that was found to be overloaded were not identified.	Several mitigation possibilities for the surcharging problem, including enlarging the pipe, and the cost and schedule for that alternative have been added. For further information, please see Section 3.2.2.4 of the Final Jurisdictional EPTR and Section 3.5.2.1.1.1 of the Final Utilites EPTR.
849	The DEIS fails to discuss the Dry Creek wastewater treatment facility.	Section 2.1.7.2.2 of the FEIS concentrates on waste treatment plants with existing problems. The Dry Creek plant is described in Section 3.1.7.4.2 of the FEIS and elsewhere within the document. For further information, please see Section 2.6.2.1.2 of the Final Utilities EPTR.
850	The 9.1 mgd treatment capacity listed for the Cheyenne service area should be footnoted to identify that the capacity is determined by totaling the capacities of the Dry Creek, Crow Creek and South Cheyenne District plants.	This information has been included in Section 2.1.7.2.2 of theFEIS and Section 2.6.2.1.2 of the Final Utilities EPTR.
851	An alternate funding method should be developed in the event that the 75 percent funding from USEPA for the 201 Plan does not become available in the proper time frame.	An alternate funding method is not necessary, because recent discussions with local and state officials make is apparent that state and federal funding will be available for the entire project by 1987. Design and construction responsibilities

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		for using these funds will fall to local officials.
852	The Wyoming Department of Environmental Quality states that they are not aware of any formal Torrington 201 facilities plan being prepared.	The misstatement about a 201 Plan for Torrington has been corrected. Please see Section 3.1.7.4.2.1 of the FEIS, Section 5.2.2 of the Final Jurisdictional EPTR, and Section 2.6.2.2.6 of the Final Utilities EPTR.
853	The solid waste equipment need identified as being accelerated by the project should be mitigated by the Air Force.	Revised population projections have changed the estimated accelerated need by one year (to 1986 from 1987). Mitigation costs have been identified. For further information, please see Section 3.5.3.2.1 of the Final Utilities EPTR.
854	Stormwater impacts in South Cheyenne should be rated as significant if 60 percent of the project-related inmigrants are to live there.	South Cheyenne is now expected to receive less than 30 percent of the project-related inmigrants. Storm drainage facilities for a 20-acre mobile home park have been projected. These needs are not rated as significant project impacts, however, since they are expected to be provided by private developers and paid for by new homeowners. For further informaiton, please see Section 3.1.7.4.4.2 of the FEIS and Section 3.5.4.2.1 of the Final Utilities EPTR.
855	Times of concentration should be identified for each sub-basin and a corresponding rainfall intensity should be used.	Times of concentration and corresponding rainfall intensities have been identified for possible development areas. For further information, please see Section 3.5.4.1.1.2 of the Final Utilities EPTR.
856	The 25-year rainfall value was inaccurately given and calculations using this value should be revised.	All rainfall data have been verified. No computations involving the 25-year rainfall event have been made. Storm sewer analyses were based on 10 and 100-year events. For further information, please see Section 3.2.5.1 of the Final Jurisdictional EPTR and Section 2.6.4.1.1 of the Final Utilities EPTR.
857	The Rational Method was applied occasionally to areas beyond its applicability (200 acres).	Generally, the Rational Method should be applied to areas smaller than 640 to 1,000 acres. Additional analyses have been made for new development areas of 20 to 160 acres. For further information, please see Section 3.2.5.2 of the

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		Final Jurisdictional EPTR and Section 3.5.4.1.1.2 of the Final Utilities EPTR.
858	Smaller sub-basins should have been used and, at a minimum, the Storm Water Management Model should be applied to each of these.	In the Final Jurisdictional EPTR and the FEIS, sub-basin size was reduced to 20 to 160 acres. The Storm Water Management Model and the city's drainage criteria have been used for impact development areas.
859	Attenuation of flood peaks for 100-year floods should be addressed, and needed retention volumes should be identified.	Retention storage requirements for 100-year floods have now been considered. For further information, please see Section 3.2.5.2 of the Final Jurisdictional EPTR and Section 3.5.4.1.1.2 of the Final Utilities EPTR.
860	Storm drainage planning should be more detailed to include consideration of commercial as well as housing developments, downstream flooding potential, and more detailed explanations of methodology.	Storm drainage analysis methods have been reapplied with far more detail provided, including material on some of these matters. For further information, please see Section 3.1.7.4.4 of the FEIS and Section 3.5.4.1.1.2 of the Final Utilities EPTR.
861	The DEIS should address storm sewer maintenance costs incumbent upon city government.	The maintenance costs estimated for storm sewer systems in Cheyenne, 165 to 245 dollars per year per household, would be payable to the city as a fee or tax. No new work crews or equipment should be necessary. For more information, please see Section 3.1.7.4.4 of the FEIS and Section 3.5.4.1.1.1 of the Final Utilities EPTR.
862	Storm water mitigations should be reconsidered and rewritten with regard given to 4 detailed comments by the commenter.	Storm drainage impacts in Cheyenne have been completely reevaulated and found to be negligible, as a result of local requirements on developers to provide adequate systems in new land developments. For further information, please see Section 3.1.7.4.4 of the FEIS and Section 3.5.4.2.1 of the Final Utilities EPTR.
863	If population disaggregations to specific areas are revised, storm drainage analyses should also be revised to reflect this.	Storm drainage analyses have been applied to 20, 40, 80, and 160-acre developments on lands with slopes between 0.5 and 6.0 percent for 3 types of housing. Population disaggregations to specific parcels of newly developed land have not been made. For further information, please see Section 3.1.7.4.4 of the FEIS and Section 3.5.4.1.1

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		of the Final Utilities EPTR.
864	The effects of new upstream developments on existing downstream storm drainage facilities should be addressed.	They have been addressed in that the assumption was made that existing ordinances limiting outflow from any developments to historical levels will be enforced. Hence, downstream impacts should be minimal or undetectable. It could not be assumed that precise locations, street patterns, and land slopes for the new development areas could be specified in advance. While more detailed stormwater analyses have been added, they still could only be applied to generalized and assumed growth patterns and locations. For further information, please see Section 3.2.5.2 of Final Jurisdictional EPTR.
865	Upgrading at F.E. Warren AFB may cause increases to surface runoff, the storm sewers for which were not analyzed.	Upgrades on F.E. Warren AFB will change the imperviousness of the base negligibly. No significant increase in runoff should occur, and no new storm sewers on the base are planned.
866	Telephone lines in rural areas may need to be upgraded for the project, and they could use such an upgrading. Existing cable has "no room" for additions.	Project-related telephone service impacts in rural areas will be negligible. Capacities in community wide systems operated by Mountain Bell, United Telephone Company of the West, and the Chugwater Telephone Company have been reported by these companies to be adequate or under current expansion. For further information, please see Section 3.1.7.4.5 of the FEIS and Sections 3.5.5.1.2 and 3.5.5.2.2 of the Final Utilities EPTR.
867	The project impact on availability of Rural Electrification Administration power and telephone systems may be greater than anticipated.	Availabilities of telephone and other utility systems have been determined to be adequate. For further information, please see Section 3.5.5.2.2 of the Final Utilities EPTR and the Final Energy EPTR.
868	The study should address the increased operation and maintenance costs to the City to maintain additional storm drainage facilities.	Maintenance is likely to be roughly equal to the annualized construction cost, which has been estimated. For further information, please see Section 3.5.4.2.1 of the Final Utilities EPTR.
869	The utilities section of the study was prepared without the benefit of field studies which can	The majority of the information used in the utilities analysis consisted of historical utility

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	best provide an independent impact assessment.	service demand records or as-built construction plans which are the final product of field information that has been gathered and reduced by other parties. When these types of record were not available, field studies were conducted as was done for the City of Cheyenne sanitary sewer and storm drainage systems.
870	Definite impact mitigation and indirect impact mitigation measures are not specified for impacts on utility systems.	The FEIS has identified a range of possible mitigation options and responsible implementing parties but leaves to local prerogatives and negotiation the choices of actual mitigation options.
871	Dig-in problems with existing underground utility facilities are not addressed, when addressing placement of intersite cables. Dig-ins of underground utility facilities during upgrading and construction of transportation facilities are also not addressed.	Locations of existing utilities will be determined during design and construction to eliminate conflicts of project utilities with existing utilities.
872	The DEIS estimated that the 1983 maximum hour water demand would be 27.27 mgd, however, the actual 1983 peak hour water demand was 36.4 mgd.	Maximum hour water demands for Cheyenne were previously analyzed as 2.06 times average day demands. The Final Utilities EPTR uses an analysis of maximum day (average day of a hot summer week) as 2.3 times the average day demand. For further information, please see Section 2.6.1.1.2.2 of the Final Utilities EPTR.
873	The computer model used in analyzing the water distribution system should be more detailed and better tuned to reflect actual conditions before it is used to make conclusions about the strengths or weaknesses of the distribution system.	The water distribution system model for Cheyenne is now adequately detailed. It was orginally calibrated against measured pressure data from 25 fire hydrants. Subsequent fine tunings were performed against specific location pressure data recorded by the Board of Public Utilities and others. For further information, please see Section 3.2.3.1.3.2 of the Final Jurisdictional EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
874	The actual 1983 maximum day water demand was recorded at 33.5 mgd rather than 30.0 mgd as stated within the DEIS.	For the FEIS, the peak period demand for the highest demand day of a full year has been computed as 2.7 times the average day demand. The 1983 value thus computed is 34.6 mgd. The daily demand on that day has been estimated as 2.5 times

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		the average day demand. The 1983 value thus computed is 32.0 mgd. For further information, please see Section 3.2.3.1 of the Final Jurisdictional EPTR.
875	The DEIS should develop a funding source to resolve sewer surcharging problems and implementation of the 201 Plan.	Funding for identified project-impact mitigations has been treated in a separate report, the Fiscal Impact Analysis.
876	The report does not address telephone service conditions and requirements of the Chugwater Telephone Company.	Information regarding the conditions and capabilities of the Chugwater Telephone Company has been collected and analyzed. For further information, please see Section 2.6.5.2.1 of the Final Utilities EPTR.
877	While the Draft Utilities EPTR notes adequate capacity available in Mountain Bell's Cheyenne central office to handle project impacts it does not address the adequacy of "outside plant" telephone to service the expected growth	The Draft Utilities EPTR concentrated on identifying principal telephone equipment needs and limitations (central office and main station equipment, etc.). This was done in order to understand the nature of any primary system improvements made necessary by the project. Auxiliary equipment requirements can only be identified at the time system improvements are specified.
878	The statement that Mountain Bell's Laramie central office is adequate to accomodate projected growth is irrelevant since Laramie will not experience significant project impact.	Laramie is not expected to receive any project-induced impacts and so has been deleted from the report.
879	The information describing Mountain Bell's Pine Bluffs central office capacity is inaccurate.	Data describing Mountain Bell's Pine Bluffs central office capacity were gathered from Mountain Bell officials who are knowledgeable of service capacities and capabilities in Pine Bluffs.
880	The information describing Mountain Bell's Wheatland central office is unclear as to its present capacity.	The text has been clarified to reflect Mountain Bell's capacity to handle an additional 750 customers. For further information, please see Section 2.6.5.2.7 of the Final Utilities EPTR.
881	Rate impacts on telephone customers may be greater than anticipated due to insufficient information provided to the telephone utilities for rate estimates.	Detailed information regarding future telephone system requirements was provided by each company serving the area of concentrated study in order to understand fully equipment requirements and

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		potential impacts upon service, rates and other factors. At this time no adverse impacts upon rate schedules are anticipated.
882	No mention was made of mitigative measures for rate impacts on existing Mountain Bell and United Telephone customers due to project impacts.	Rate impacts are not anticipated as a result of the Proposed Action by telephone company officials. Therefore mitigation measures are not required.
883	The description of Mountain Bell's Cheyenne central office capacity found within Section 3.5.5.1.1 (Proposed Action) conflicts with information provided with in Section 2.6.5.1 (Affected Environment).	Mountain Bell's Cheyenne central office served 33,183 customers in 1982 with capacity to serve an additional 1,150 customers. The information contained in Section 2.6.5.1 of the Draft Utilities EPTR was misprinted as 23,183. The two sections are consistent in the Final Utilities EPTR.
884	Project related growth in demand for telephone service in Pine Bluffs and other communities near the deployment area may be much more significant than is stated.	Based upon present telephone system capabilities and capacities and the projected growth in service as determined by the analytical methods employed, project impacts are not expected to be significant.
885	The Draft Utilities EPTR has not addressed the capability of telephone "outside plant" throughout the region to accomodate the additional growth.	The Draft Utilities EPTR concentrated on identifying principal telephone equipment needs and limitations (central office and main station equipment, etc.). This was done in order to understand the nature of any primary system improvements made necessary by the project. Auxiliary equipment requirements can only be identified at the time system improvements are specified.
886	What are the costs of public utilities required by the project, and will all customers or only the additional users be expected to pay them?	All utility costs for mitigating impacts or for provision of additional services will be attributable to project sponsors or to the additional inmigrants whose service costs can be recouped through monthly charges at then-existing rates. No rate increases for the general public for any utility will be necessary as a result of the project.
887	The design flows and current flows for the Gering wastewater treatment facility as stated in the DEIS are incorrect.	These values have been corrected. Please refer to Section 2.6.2.2.2 of the Final Utilities EPTR for more detail.

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888	The City of Gering, Nebraska may need additional wastewater treatment facilities in 1992 based on the baseline growth projected in the DEIS. However, no adverse impact to the existing wastewater treatment facility is expected in 1987 due to the project.	The projected growth for the City of Gering, Nebraska, has changed slightly for the Final Utilities EPTR. However, there still should be no adverse impact to the wastewater treatment facilities. Please refer to Section 3.5.2.2.2.2 of the Final Utilities EPTR for more detail.
889	The study was generally inadequate regarding the water and sewer services available within the boundaries of the South Cheyenne Water and Sewer District.	Since the Draft Jurisdictional EPTR was published more detail has been developed for water and sewer services in the South Cheyenne Water and Sewer District. Specific analysis results have been coordinated with the District's Board. For further information, please see Sections 3.3.2 and 3.3.3 of the Final Jurisdictional EPTR and Sections 2.6.1.1.2.2 and 2.6.2.1 of the Final Utilities EPTR.
890	The study did not include an assessment of equipment and staffing of the Board of Public Utilities.	Because very small increases in the workload of the Board's Water and Sewer departments were projected, equipment analyses were not considered necessary. The current staffing of the Water and Sewer departments is listed and a reanalysis of the potential for additional staff needs was made. For further information, please see Section 3.2.3.3.3 of the Final Jurisdictional EPTR and Section 3.5.1.2.1.2 of the Final Utilities EPTR.
891	Board of Public Utilities impacts were not identified.	Increases in water and wastewater flows on the order of 6 percent were found. Any impacts resulting were considered mitigatable through facilities adjustments or power increases whose costs could be recouped by charging new customers at the existing service rates.
892	Treated water storage is not analyzed.	The distribution model used included storage facilities, and the WATSIM model found them to be adequate. For further information, please see Section 3.2.3.1.3.2 of the Final Jurisdictional EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
893	Modeled fire flow pressures, which were reported in the utilities section to be adequate, do not agree with the conclusions found in the fire	The fire protection discussion in the public services section of the Draft Jurisdictional EPTR addressed some reported pressure problems in

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	protection section.	isolated subneighborhoods served by small water mains. The utilities section of the same report gives results of modeling of much larger, major water mains, where pressure problems were not manifest. The local problems can be ameliorated with installation of larger pipes or connections made to larger pipes. Indeed, such improvements are being locally considered.
894	Stage II water supply facilities were not analyzed.	Stage II facilities are now described in the Final Jurisdictional EPTR. For further information, please see Section 3.2.3.1.1 of the Final Jurisdictional EPTR.
895	Augmentation of treated water with additional wells was not considered.	Augmentation of treated water was not projected to be needed.
896	The water distribution model has major inaccuracies in projecting pressures.	Apparent inaccuracies in pressure results have been resolved through discussion with the Cheyenne Board of Public Utilities personnel and through further, more detailed analyses. For further information, please see Section 3.2.3.1.3.2 of the Final Jursidictional EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
897	Analysis of treated water storage capacities should include peak demands other than those reported.	Demands for the recurring maximal-day water use, the single maximum-demand day of a year, and the peak 6-year period in a year have been added. For further information, please see Section 3.2.3.1 of the Final Jurisdictional EPTR.
898	Evaluation of the potential for low pressure zones may suggest a project impact and needed mitigation.	In the major water mains modeled throughout the city, pressure is rarely if ever below 50 psi. This does not mean that certain locations in the city served by pipes smaller that 6 inches in diameter do not have low pressures periodically. Analysis of those areas, however, was outside the scope of this study.
899	Service area populations and various water modeling assumptions were not stated.	Populations by neighborhood, corresponding water demands and model nodes have been tabulated in the Final Utilities EPTR. Modeling assumptions have been described in Appendix A to the Final Utilities EPTR. For further information, please see Section 3.2.3.2 of the Final Jurisdictional

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		EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
900	The study should address the issue of funding for mitigations.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts generated by deployment and peacetime operation of the Peacekeeper system. General cost estimates for the mitigation of those impacts identified have been included. For further information, please see Sections 3.2.2.4 and 3.2.4.4 of the Final Jurisdictional EPTR.
901	The Cheyenne Board of Public Utilities requests working copies of computer models and attendant input data.	Arrangements for this transfer have been made. The Air Force is committed to providing working copies of computer models to the Cheyenne Board of Public Utilities.
902	Peak demands in 1983 should be higher than 1980 demands in the same proportion as population growth.	Total water demands for the City of Cheyenne have not increased in direct relation to population growth because industrial water demands have grown at a much slower rate.
903	Maps showing zones of pressure below 50 psi should be provided.	In the major water mains modeled throughout the city, pressure is rarely if ever below 50 psi. This does not mean that certain locations in the city served by pipes smaller than 6 inches in diameter do not have low pressures periodically. Analysis of those areas, however, was outside the scope of this study.
904	The 1990 baseline service population in the utilities section does not correlate with tabulated figures in the general government section.	The water service population for the Cheyenne Board of Public Utilities has been assumed to be that of F.E. Warren AFB plus 92.5 percent of that in the Cheyenne Census Division, which includes South Cheyenne. These assumptions are supported by historical water usage rates.
905	Water supply facilities, specifically Stage I and II pipelines, were not addressed. They should be mentioned and project demands compared with their capacities.	The Stage I and II projects have been described in the Final Jurisdictional EPTR and compared with project-related water demands. For further information, please see Section 3.2.3.1.1 of the

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		Final Jurisdictional EPTR and the Final Water Resources EPTR.
S06	Water demand rates should be provided with corresponding population figures including weekly commuters.	Populations and demand rates have been reported for each neighborhood in the final Utilities EPTR. Weekly commuters are included. For further information, please see Section 3.2.3.1.1 of the Final Jurisdictional EPTR and Section 3.5.1.2.1.2 of the Final Utilities EPTR.
907	There is no water distribution modeling of South Cheyenne Water & Sewer District.	The water distribution system in South Cheyenne has been analyzed with the WATSIM model since Draft Jurisdictional EPTR publication. For further information, please see Section 3.3.3.1 of the Final Jurisdictional EPTR and Section 3.5.1.2.1.2 of the Final Utilities EPTR.
908	The South Cheyenne Water & Sewer District's tap moratorium imposed in the fall of 1983 may obviate many of the conclusions in the Draft Jurisdictional EPTR about this area.	Considerable analysis has been made of hydraulic problems that appear to have led to the moratorium. Potential solutions have been identified which may lead, at least in part, to an early lifting of the moratorium. Local plans for pipelines to support 15,000 residents by the year 2005 are currently being developed. For further information, please see Section 3.3.3 of the Final Jurisdictional EPTR and Section 2.6.1.1.2.2 of the Final Utilities EPTR.
909	With respect to Pine Bluffs' water usage, "...cavalier dismissal of actual consumption data and the substitution of 'textbook' per capita consumption figures is inexcusable."	Both the actual consumption rate and a more nominal value were reported in the Draft Jurisdictional EPTR. The actual value, 1,271 gallons per capita per day (gpcd), is the highest reported in the Area of Site Influence and is higher than most others in the United States, including those for nonmetered communities. Section 3.5.3 of the Final Jurisdictional EPTR describes Pine Bluffs' water usage at its reported unit usage values.
910	Wastewater irrigation to defer water treatment capacity expansion was not discussed with respect to its actual feasibility. Such a discussion is necessary.	The feasibility of the wastewater reclamation concept for F.E. Warren AFB is now discussed. For further information, please see Section 3.2.3.4 of the Final Jurisdictional EPTR and Sections 3.5.1.2.4.1 and 3.7.1.1.2 of the Final Water Resources EPTR.

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911	The study did not include a discussion of possible life-shortening uses of sewer system appurtenances such as pumps. Additionally, the study did not include discussion of project-related inmigration early in the 201 Plan's life.	It has been assumed that any added costs associated with higher uses of 201 Plan facilities, such as pumps, occasioned by the project inmigrants, can be recouped at planned communitywide service rates. The facilities themselves will be adequately sized for both project and baseline conditions.
912	The 201 Facilities Plan may not be implemented as soon as projected, and the effects of delaying implementation should be analyzed.	The most recent information indicates that the 201 funding will commence in early to mid-1984. Local design and final grant applications must be completed by September 30, 1984 to ensure 75% EPA funding. The effects of not implementing the Plan in a timely fashion amount to exacerbation of discharge requirement violations. For further information, please see Section 3.2.2.2.2 of the Final Jurisdictional EPTR and Section 3.5.2.1.1.2 of the Final Utilities EPTR.
913	The study should develop a plan to assure funding for the 201 Plan.	Recent discussions with local and state officials make it apparent that state and federal funding will be available for the entire project by 1987. Design and construction responsibilities for using those funds will fall to local officials.
914	Weekly commuters have not been included in wastewater analysis.	Weekly commuters were included in the Draft Jurisdictional EPTR wastewater analyses. Both weekly commuters and transients (unsuccessful job-seekers) are now included in all utilities analyses.
915	Surcharged 12-inch sanitary sewer causes flooding of basements as well as streets.	This information has been added. For further information, please see Section 3.2.2.1.1 of the Final Jurisdictional EPTR and Section 2.6.2.1.1 of the Final Utilities EPTR.
916	The study should include a map of expanded sanitary sewers into new growth areas.	Precise locations for new-development housing cannot be predicted, although waste flows from expected new-growth areas have been modeled. For further information, please see Sections 3.2.2.2 and 3.2.2.3 of the Final Jurisdictional EPTR.
917	City of Cheyenne waste flows have apparently been measured inaccurately in the past by as	A measurement error has been corroborated by local officials and the analyses have been changed

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	much as 1 mgd, and the study should reflect the effect in both baseline and impact conditions.	to reflect its effect. For further information, please see Sections 3.2.2.1.2 and 3.2.2.3.2 of the Final Jurisdictional EPTR.
918	Modeled sewer flows in South Cheyenne should include additions from Infiltration/Inflow.	Modeled sewer flows in the Draft Jur sdictional EPTR did contain some allowance for nominal Infiltration/Inflow. Now, additional analyses of Infiltration/Inflow have been made. For further information, please see Section 3.3.2 of the Final Jurisdictional EPTR and Section 3.5.2.1.1.1 of the Final Utilities EPTR.
919	Analysis of the wastewater collection system in South Cheyenne is needed.	South Cheyenne's sewer system has now been analyzed in more detail with the SWMM model. The sewer system has been found to be adequate. For further information, please see Section 3.3.2 of the Final Jurisdictional EPTR and Section 2.6.2.1.1 of the Final Utilities EPTR.
920	No formal 201 Facilities Plan is being prepared for Torrington, despite the Jurisdictional EPTR comment to the contrary.	This inaccuracy has been corrected in the Final Jurisdictional EPTR.
921	The question of sanitary waste collected in chemical toilets at project sites should be addressed.	The question of these wastes has been addressed in the Final Jurisdictional EPTR. For further information, please see Section 3.2.4.3.3 of the Final Jurisdictional EPTR and Section 3.5.3.2.3 of the Final Utilities EPTR.
922	Project impacts for sanitation in Cheyenne may be of greater scale and possibly sooner than projected.	New analyses of sanitation loads and equipment needs have been made. For further information, please see Section 3.2.4.3 of the Final Jurisdictional EPTR.
923	Solid waste disposal equipment is not described. Also responsibilities for both collection and disposal were incorrectly assigned to the Department of Sanitation.	The disposal responsibility assigned to the Street and Alley Division is noted and has been corrected. Solid waste disposal equipment is described. For further information, please see Section 3.2.4.1 of the Final Jurisdictional EPTR and Section 2.6.3.1.1 of the Final Utilities EPTR.
924	Cheyenne's solid waste landfill site may have a less optimistic future than the Draft Jurisdictional EPTR implied, as a result of the potential for contamination of Cheyenne's own	The monitoring program described in the report was intended to be the first step in local and state cooperative actions to ameliorate the concern. In the monitoring performed thus far,

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	public water-supply aquifer system which lies immediately below the landfill.	no harmful effects have been detected. The state's Solid Waste Management Program in the Department of Environmental Quality would like the city to make some operational changes at the surface of the landfill anyway, to further limit the potential for contamination. The city appears disposed to comply. The contamination potential appears remote, and the life of the landfill is virtually assured.
925	Need for pending collection route is acknowledged.	Noted.
926	The solid waste transfer station now planned should handle anything over and above demands predicted.	Noted.
927	What is the substantiation for the projected need for an additional compactor when loads exceed 200 tons per day?	Analyses of historical practices indicate that loads in excess of 200 tons per day require additional equipment.
928	Costs of specific solid waste equipment resulting from the project should be provided.	Cost estimates for solid waste equipment whose need has been induced in part by the project are now described. For further information, please see Section 3.2.4.4 of the Final Jurisdictional EPTR.
929	Solid waste impacts should include loads from weekly commuters.	Solid waste loads listed in the Draft Jurisdictional EPTR did include weekly commuters, and the loads listed in the Final Jurisdictional EPTR include both weekly commuter and transient loads. For further information, please see Section 3.2.4.3 of the Final Jurisdictional EPTR and Section 3.5.3.1.1.1 of the Final Utilities EPTR.
930	Figures and conclusions on solid waste disposal are too low.	The solid waste loads were based on historical unit rates of waste generation. Further analyses have been made of projected solid waste loads, and more detailed information about equipment needs have been obtained from the City of Cheyenne Engineer's staff. For further information, please see Section 3.2.4.1 of the Final Jurisdictional EPTR and Section 3.5.3.2.1 of the Final Utilities EPTR.
931	How were solid waste loads determined?	Solid waste loads throughout the Area of Site Influence have historically been approximately 5

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		pounds per capita per day. This value was multiplied by populations for all baseline and project impact conditions.
932	Solid waste collection service areas and populations were not provided.	Solid waste loads from Cheyenne, South Cheyenne, and urban fringe areas have now been computed for the populations of each of these areas. For further information, please see Section 3.2.5.1 of the Final Jurisdictional EPTR.
933	Methods to determine additional solid waste collection routes in Cheyenne are not described. They should be derived from the housing allocation.	Project-related loads for Cheyenne and resultant equipment needs were derived from city wide population estimates. Numbers of collection routes were projected for each year and corroborated by the City Engineer's office in Cheyenne. For further information, please see Section 3.2.4 of the Final Jurisdictional EPTR and Section 3.5.3.1.1.1 of the Final Utilities EPTR.
934	The Draft Jurisdictional EPTR implies that private firms in Cheyenne collect and dispose locally toxic and hazardous wastes; the Wyoming Department of Environmental Quality knows of no such dumps in the immediate area and sanctions no such dumping.	The thrust of the sentence in question is that private firms must send their toxic and hazardous wastes to permitted sites or recycle these materials or render them innocuous. Such permitted dump sites are all believed to be not only outside the Cheyenne area but also outside Wyoming. The Air Force has no knowledge of illegal, unsanctioned dumping of hazardous or toxic materials within Wyoming (or Nebraska).
935	No quantitative figures are given for toxic and hazardous wastes. "Minor" is not clear. There was also no reference to nuclear waste material.	The Air Force expects that toxic and hazardous waste generation rates will be only very slightly higher or no different from those in the current Minuteman configuration. Hence, the Peacekeeper quantity was called "minor" because the amount is not absolutely known but predictably well below small quantity generator limits (1,000 kg/month). The Minuteman quantities were given in the Draft Jurisdictional EPTR in Section 3.2.4.2.2. These estimates have not changed. There is a reference to nuclear waste in Section 3.2.4.3.2 which says, "The project does not include any operational features involving nuclear waste production or storage at F.E. Warren AFB."
936	Analysis of impacts on private solid waste haulers in South Cheyenne needs to be made, and	Private haulers have been interviewed since the publication of the Draft Jurisdictional EPTR.

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	specific mitigative measures for private haulers should be considered.	No adverse impacts were identified. For further information, please see Section 3.3.4 of the Final Jurisdictional EPTR.
937	Impacts of project-related growth in South Cheyenne are not predicted for the City sanitary landfill.	Roughly 10 of 185 tons per day are contributed by South Cheyenne to the City's landfill. The landfill is currently contained within 30 acres of 1,100 available acres. No impact on the landfill from South Cheyenne has been projected. For further information, please see Section 3.3.4.3 of the Final Jurisdictional EPTR and Section 3.5.3.1.1.2 of the Final Utilities EPTR.
938	The use of surface drainage rather than buried storm sewers has not been addressed.	Storm drainage facilities have been described in the context of the more demanding (expensive) underground systems. However, both above-ground and buried storm drainage facilities have been discussed. For further information, please see Section 3.2.5.2 of the Final Jurisdictional EPTR and Section 3.5.4.1.1.2 of the Final Utilities EPTR.
939	Mitigations might mention both underground and above-ground storm drainage systems.	Storm drainage facilities have been described in the context of the more demanding (expensive) underground systems. However, both above-ground and buried storm drainage facilities have been discussed. For further information, please see Sections 3.2.5.2 and 3.2.5.3 of the Final Jurisdictional EPTR and Section 3.5.4.1.1.2 of the Final Utilities EPTR.
940	Maintenance costs for new storm sewers are not addressed.	Generalized construction and maintenance costs for storm sewers are discussed. For further information, please see Section 3.2.5.2 of the Final Jurisdictional EPTR.
941	Details of needed storm sewers were not specified by the analysis and may not be possible to provide at this time. Nonetheless, a more rigorous analysis would be advantageous.	While it is agreed that specifying needs for particular areas is not possible at this time, another level of detail has been achieved in specifying storm sewer lengths and sizes for hypothetical new development areas. It is incontestable that specific engineering analyses will be required of developers of new land to design adequate facilities for unique parcels of land.

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942	Potential solutions to existing drainage problems in Cheyenne were not analyzed.	Two storm sewer sub-basins in downtown Cheyenne were analyzed in the Draft Jurisdictional EPTR for existing problems. Generally, specific solutions to existing problems are considered to be beyond the scope of this project.
943	The differences between baseline and impact storm flows and required facilities are unclear.	Detailed descriptions of analyses made subsequent to the Draft Jurisdictional EPTR of baseline and impact condition storm drainage facilities are included. For further information, please see Section 3.2.5.3 of the Final Jurisdictional EPTR and Section 3.5.4.2.1 of the Final Utilities EPTR.
944	Analysis methods were generally inadequate for proper description of detailed project impacts.	State-of-the-art mathematical modeling and Cheyenne's drainage criteria for hypothetical sewer networks have now been applied. For further information, please see Sections 3.2.5.2 and 3.2.5.3 of the Final Jurisdictional EPTR and Section 3.5.4.1.1.1 of the Final Utilities EPTR.
945	A suggested detailed drainage study for new development areas of Cheyenne is not an adequate mitigation. Such study should have been completed in the Draft Jurisdictional EPTR effort.	Storm drainage facilities must be specified, in the end, on a site-specific basis. This impact analysis cannot predict these locations with specificity. Any new development will require an engineering study to size precise drainage structures.
946	Downstream drainage impacts were not assessed. Actual areas of development under impact conditions were not mapped.	The assumption has been that existing ordinances limiting outflow from new developments to historical levels will be enforced. Hence, downstream impacts should be minimal or undetectable. It could not be assumed that precise locations, street patterns, and land slopes for the new development areas could be specified in advance. While more detailed stormwater analyses have been added, they still could only be applied to generalized and assumed growth patterns and locations. For further information, please see Section 3.2.5.3 of the Final Jurisdictional EPTR.
947	The Manning's roughness coefficient used for calculations should be identified.	The n-value of 0.02 was selected from standard engineering texts, and the effect of using other values was described. For further information, please see Section 2.5.4.2 of the Final Utilities

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		EPTR.
948	Additional facilities, such as shopping centers and parks, should be addressed with respect to drainage impacts.	Very generalized additional commercial land use needs have been included in socioeconomic and land use projections. The resulting additional acreage of these developments was so small that meaningful storm drainage requirements for these areas could not be specified.
949	Housing used for storm water analysis does not correlate with projected housing in the land use section.	For the Final Jurisdictional EPTR, all new development areas were projected by the socio-economic and land use task groups, and were consistently used for further stormwater analyses. For further information, please see Section 3.2.5.3 of the Final Jurisdictional EPTR and Section 3.5.4.2.1 of the Final Utilities EPTR.
950	Methods for selecting C-values in the Rational Method are unclear; specifically, why was 0.05 used for mobile home parks?	C-values between 0.4 and 0.7 were selected in the original analysis, depending on the combination of density of development and land slope and in accordance with standard engineering texts. A value of 0.5 could be applicable for a mobile home park on very flat land. A value of 0.05 was never used.
951	South Cheyenne has serious storm drainage problems, which will be difficult to ameliorate. A more detailed analysis is needed.	More detailed storm sewer analyses have been performed since publication of the Draft Jurisdictional EPTR. For further information, please see Sections 3.3.5.2 and 3.3.5.3 of the Final Jurisdictional EPTR and Section 3.5.4.2.1 of the Final Utilities EPTR.
952	Current development densities throughout the Cheyenne urban area should be reflected in storm drainage analyses.	A wide range of densities, including existing and projected new-growth area densities, has been analyzed in the Final Jurisdictional EPTR. For further information, please see Section 3.2.5.2 of the Final Jurisdictional EPTR and Section 3.5.4.1.1.1 of the Final Utilities EPTR.
953	The difference of governmental structure in South Cheyenne may require different approaches to solutions for the drainage problems. The effects of drainage problems on growth should be analyzed.	Provison of storm drainage facilities both in Cheyenne and in South Cheyenne has been assumed to be the responsibility of land developers who provide new housing units and the streets and other facilities appurtenant thereto. Storm drainage facility needs for single-family, multi-

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		family, and mobile home developments anywhere in the Cheyenne Urban Area have been estimated based on application of the City of Cheyenne's drainage criteria, which admittedly may be more demanding than Laramie County might impose on builders in South Cheyenne. Nonetheless, very little project-induced land use change is anticipated for South Cheyenne, and the drainage structures indicated represent a useful, worst-case description.
954	The additional building at F.E. Warren AFB and the potential for increased runoff should be addressed.	Only very minor changes in hard surfacing at F.E. Warren AFB associated with the added buildings are projected either in baseline or project circumstances. Hence, no appreciable additional runoff is anticipated.
955	Availability of energy and telephone utilities for project-related services was not described.	A separate and comprehensive Final Energy EPTR addresses energy utilities. Telephone service is described in various sections of the Final Utilities EPTR. Guidelines for the Jurisdictional EPTR do not require consideration of either utility.
956	More detail should be provided in the Draft Jurisdictional EPTR regarding the impact of the inmigrant population on the South Cheyenne Water & Sewer District. Also, no mitigation measures or strategies were proposed for the District which is the most heavily impacted area in the region.	The analysis of impacts in South Cheyenne has been reevaluated. For further information, please see Section 3.3 of the Final Jurisdictional EPTR and Section 3.3.3 of the Final Utilities EPTR.
957	More attention should be paid to the costs of public utilities required by the project. Who pays for the new utility delivery system, all users or the additional users?	No new major energy utility system extensions will be required as a result of the project. Who bears the cost of localized energy utility extensions varies based on local utility policies. In nonenergy utilities, the costs of extensions will be borne by the new users, who will pay these costs as part of their new home price. For further discussion of impacts on utilities, please see the Final Energy and Final Utilities EPTRs.
958	Information about Kimball's wellfield made available to the Air Force was not considered and reported in the document.	That material has now been considered. The material provided has been referenced in Section 7.2.3.1 of the Final Jurisdictional EPTR.
959	Pumping well capacities have been inaccurately described.	Well capacities have been checked against state records and resolved with the report submitted by

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		the commentor. For further information, please see see Section 7.2.3.1 of the Final Jurisdictional EPTR.
960	Inaccurate pumping capacities in Kimball may ha e led to wrong conclusions about the need for new facilities.	Kimball's well capacities have been reevaluated. For further information, see Section 7.2.3.1 of the Final Jurisdictional EPTR.
961	Kimball's solid waste disposal site location was given incorrectly.	This information has been corrected in the Final Jurisdictional EPTR.

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962	Will disruption of electrical service occur for any period of time? Will disruptions occur during peak pumping periods for irrigators?	At this time it is expected that few, if any, power lines well be distrubed. Disruption of electrical service in the Deployment Are will be limited to those brief periods when a local powerline is permanently raised to allow adequate clearance for the stage transporter. It is not currently known how many powrlines will need to be raised. However it is expected that there would be only a few, if any. This information will be developed further into the planning process. The responsible electric utilities will be contacted by the Air Force to raise those lines determined to have inadequate clearance. In some cases power to localized areas may be disrupted, but this is expected to last for only a few hours. Disruption may occur during the irrigation season. For further information, please see Section 1.5.1.2.1 of the Final Energy EPTR.
963	The DEIS refers to a new electrical substation to be added to the system serving Kimball. Why is it being built and who will pay for it? Who is going to use the additional 15-percent of electrical energy consumption projected for Kimball?	The Kimball Electric Department intends to build the 10,000 KVA substation as part of its future upgrade program. This program will move forward independently of Peacekeeper construction. With regard to financing the new substation, that is a decision to be made by the Kimball Electric Department. The 15-percent increase in electricity consumption shown in Table 3.5.1-2 is from the utility's own projections. They include potential industrial needs. For further information, please see Section 3.1.1.2 of the Final Energy EPTR.
964	Who will pay for increased electrical consumption by the Peacekeeper?	Increased electrical consumption resulting directly from Peacekeeper construction or operation will be paid for, respectively, by the contractors and by the Air Force through utility charges assessed by the affected electric utilities. Increased consumption induced by the project as a result of workers and their families will be paid by the individual workers themselves, as customers of the electric utilities.
965	The coal production dat for Wyoming and Nebraska are incorrect.	The correct coal production values for Wyoming and Nebraska have been incorporated. For further information, please see Section

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		2.1.8.2.4.1 of the FEIS.
966	Will Peacekeeper construction and operations activities impact oil well drilling operations?	Access to lands for purpose of petroleum exploration and production will not be affected by the project other than a continuation of some specialized restrictions upon drilling near the missile silos.
967	Paragraph 1.1 and Table 1.1-3 of the Draft Energy EPTR are insufficient to allow assessment of project-related electrical energy and demand requirements.	Section 1.0 of the Energy EPTR is only intended to give the reader an overview of the Peacekeeper deployment project. Construction electrical demand at the individual Launch Facilities may exceed the local transformer capacity (generally about 75 kW) for a short period of time. If this is likely to occur the contractor will be required to supply power from a portable generator or else to make special arrangements with the local electric utility and to absorb the costs resulting from the arrangements. Peak electrical demand for construction at F.E. Warren AFB is not expected to exceed 1000 kW. For further information on project electrical requirements, please see Section 3.5.1.2.1 of the Final Energy EPTR.
968	The rural electric associations may have to upgrade the electric facilities serving each launch facility in order to serve short-term construction needs.	This was taken into consideration in the final analysis. In the Deployment Area, substantial electrical use for construction will occur only at the individual Launch Facilities (LFs). During the silo modification period, normal operational loads will be disconnected. Peak construction loads are not expected to exceed the operational loads most of the time. Should peak construction demand exceed this level (arc welding, for instance), the contractor will use a portable electric generator at the site or else make special arrangements with the local electric utility, paying the cost associated with the temporary delivery of additional power. For further information, please see Section 3.2.2 of the FEIS and Section 3.5.1.2.1 of the Final Energy EPTR.
969	The impact analysis of electrical supply systems may not be conservative as stated in Section 3.1.1.1 of the Draft Energy EPTR.	In selecting which electric utilities warranted detailed analysis, peak induced residential demand and consumption were estimated by a simple method.

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		The total number of inmigrants was divided by average local family size (2.56) to calculate number of residences. This latter number was then multiplied by average annual consumption to obtain an initial estimate of induced demand. The induced demand was then compared to existing energy data (1982). In all cases, future baseline electrical use is projected to increase beyond 1982 levels. Therefore, initial use of 1982 data for comparison with peak induced electrical use during the period 1986 to 1989, would tend to yield a higher (i.e., a more conservative) ratio than that ultimately calculated during detailed analysis. For further information, please see Section 3.1.1.1 of the Final Energy EPTR.
970	Does the Western Area Power Administration have the capability to supply power for onbase construction? There is an apparent inconsistency in the description of electrical supply facilities for F.E. Warren AFB.	Section 2.2.1 of the Draft Energy EPTR stated that the Western Area Power Administration (WAPA) can supply the increased, long-term operational needs of F.E. Warren AFB associated with Peacekeeper deployment. However, WAPA may not be able to supply the short-term construction power needs at the base since its firm supply is currently fully committed. The existing WAPA substation is scheduled in 1985 to be upgraded from 7,200 KVA (not kV) to 10,000 to 12,000 KVA. This correction now appears in Section 3.5.1.2.1 of the Final Energy EPTR.
971	Past Minuteman construction experience indicates that coordination of the contractors with the local electric utilities has been poor.	Construction and buried communication cable contractors for the Peacekeeper project will be required to coordinate with the local utilities in order to minimize disruption of service. Where the buried cable passes beneath overhead power lines, no impact to the electrical lines will occur. Such crossings will always be perpendicular, or nearly so, to the path of the power lines.
972	The Air Force does not provide estimates of peak electrical demand for project construction. This demand may result in increased electrical costs that are passed on to all customers. The Air Force has not committed to any mitigation measures to avoid this problem.	This has been included in the final analysis and determined from: construction at F.E. Warren AFB and construction in the Deployment Area. Average electrical demand due to construction at F.E. Warren AFB will be about 600 kW. A reasonable estimate of peak demand is 1,000 kW. This would

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		occur during the 1985-1986 period of construction at the base. In order to avoid impact to the Cheyenne Light, Fuel and Power system and particularly, potential cost increases to local customers, the Air Force has committed to supplying the electrical needs of the base construction contractors directly from a regional source. This assures that the contractors, not the existing electric utility customers, will pay the full costs for their construction-related electricity. For further information, please see Section 3.1.8.4 of the FEIS. With regard to the deployment area, substantial electrical use for construction will occur only at the individual Launch Facilities (LFs). Existing line transformer capacity is a minimum of 50 to 75 kW at each LF. Should peak construction demand exceed this level (arc welding, for instance), the contractor will use a portable electric generator at the site or else make special arrangements with the local electric utility, paying the cost associated with the temporary delivery of additional power. For further information, please see Section 3.2.2 of the Final Energy EPTR.
973	The DEIS does not specifically address the possible need for electrical utilities to upgrade and expand their local distribution systems to accommodate increased electrical loads caused by both the project and the related population growth.	In the final anlaysis, consideration was given specifically to the impact of project construction power demands upon existing local power facilities. In the case of construction at F.E. Warren AFB, the contractor will be required to contract directly with the electrical supplier, paying the full cost of supplied electricity and the costs of facilities to deliver it to the construction site. For further information, please see Section 3.1.8.4 of the FEIS. At the individual Launch Facilities in the Deployment Area, normal construction electrical loads are not expected to exceed the current operational loads, which will be disconnected during silo modification. Special peak loads resulting from the short term use of arc welding, heavy duty electric winches (or other heavy power users) will be supplied by a portable electric generator. The local facility require-ments needed to serve the induced populations in

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		the several towns in the project area will vary according to the settlement patterns experienced by each town. Exact requirements for local power poles and line transformers cannot be predicted at this time. Howver, with proper planning, the towns of Pine Bluffs, Kimball and Wheatland can direct population growth to those locations where project workers have lived during large construction projects over the last decade. Most of the local energy infrastructure is already in place. In the case of Cheyenne, outmigration during the latter part of the project period (1988 through 1991) will be more than compensated for by projected baseline growth. The effect will be to accelerate the installation of local power facilities from the late to the mid-1980's. All facilities will continue to be used following project construction and should result in no impact upon Cheyenne Light, Fuel and Power consumer electricty prices. For further information, please see Section 3.5.1 of the Final Energy EPTR.
974	The DEIS does not address the possible inability of electrical utilities to respond to requests for service in a timely manner.	The DEIS did acknowledge the possiblity that where substantial increases in new customers are induced by the project, the response time of the local utility to service requests may increase. This will be a temporary situation, if it does occur, lasting at most for a period of 2 years. None of the utilities contacted indicated that this was likely to be a serious problem. For further information, please see Section 3.5.1.2.2 of the Final Energy EPTR.
975	Electrical utility personnel may be taxed in locating underground facilities and in repairing damage due to dig-ins resulting directly or indirectly from project construction.	While it is possible that the frequency of damage to underground electrical facilities may increase during the peak project construction period, there was no concern voiced by any of the utility operations personnel interviewed that this was viewed as a serious potential problem. Project contractors will be required to coordinate construction activities with the utility companies in order to minimize damage to in-place facilities.
976	The DEIS does not realistically state the impact of the project upon the power rates of Cheyenne	Using the energy threshold charges as stated in the current wholesale supply contract between

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	Light, Fuel and Power.	Cheyenne Light, Fuel and Power Company and Pacific Power and Light, the price impact of the project-induced electrical requirements has been calculated. It is estimated that under worst-case assumptions, Cheyenne Light, Fuel and Power will experience a 0.4 percent increase in its wholesale electrical costs attributable to the project. In light of the considerably higher inflationary costs for labor and materials faced by all utilities, it is difficult, if not impossible, to estimate with any precision the effect that such a small and temporary cost increase would have upon the utility's rate structure. For further information, please see Section 3.5.1.2.2 of the Final Energy EPTR.
977	How can just 690 MCF per year of natural gas heat nearly 400,000 square feet of new building space at F.E. Warren AFB?	Section 3.5.2.2.1 of the Draft Energy EPTR stated that natural gas will be used to heat only six new buildings in the Stage Storage Area. Section 3.5.4.2.1 stated that most of the new buildings will be heated by the coal-fired hot water plant.
978	The DEIS does not address rate impact and manpower and material problems associated with increased demand for natural gas induced by the project.	The DEIS and the FEIS address the project impact upon natural gas price, concluding that there is none. No major transmission or storage facilities will be needed to serve project-induced growth. The operations managers of the Cheyenne Light, Fuel and Power Company and Kansas/Nebraska Energy, the two natural gas utilities in the area, foresaw no service manpower problems or price impacts when interviewed. Please see Section 3.5.2.2.2 of the Final Energy EPTR.
979	The Draft Jurisdictional EPTR covers all of the salient impacts except energy requirements (electric power). Some communities are "locked in" to long-term contractual arrangements and the study makes no reference to power requirements. The costs and financing of utility line extensions are also omitted in the Draft Jurisdictional EPTR.	The project will not result in a need for major energy facility expansions or the upgrading of existing substations (with the exception of the substation serving F.E. Warren AFB) to serve energy needs. Exact requirements for local utility line extensions to serve the induced population cannot be predicted since local settlement patterns within a community cannot be forecasted to the required precision. Overall impacts on the electricity network of those communities that will be affected by induced population growth have been addressed. It is projected that effects from the

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		project on local utility line extensions will not affect electrical rates to any measurable extent. In the case of Cheyenne, induced population growth may accelerate local line extensions to some extent. However, baseline population growth will replace those project workers who outmigrate during the latter part of the project and therefore, no excess infrastructure will be created. Pine Bluffs, Kimball, and Wheatland have all supported substantial, temporary worker populations within the last decade. Therefore, most of the local energy infrastructure is already in place. With proper planning, these communities can direct population growth to those locations which have existing energy infrastructure. The small amount of population projected for Chugwater will not result in service or local line extension problems for the Wheatland Rural Electric Association which provides electricty to the town. The effect of project-related electrical loads and consumption upon the local electrical utilities has been examined and found to have only minor impact. Energy impacts are further discussed in Section 3.1.8.4 of the FEIS and Section 3.1.5 of the Final Energy EPTR.
980	The draft Jurisdictional EPTR does not provide any discussion of the project impact on the oil and gas production facilities in Banner and Kimball counties.	The project will have no impact on energy production facilities. Should any buried pipelines be encountered during the construction of the buried cable system, the latter shall be buried at least 3 feet below the former. The existing pipelines will not be affected.

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981	Will increased traffic and road upgrades increase the possibility of cattle being hit by vehicles? Will Launch Facility upgrades increase rural road use and impact road safety?	The possibility of cattle accidents will increase during the construction period. Safety and traffic volumes were reviewed with respect to agricultural usage of roads and potential interference. Estimated increases in traffic due to project development over existing conditions were found to have a short-term adverse impact on road safety. For further information, please see Section 3.1.9.4.1.2 of the FEIS, and Section 3.5.1.2.1.1, and Sections 3.5.1.2.2.1 through 3.5.1.2.2.6 of the Final Transportation EPTR.
982	Do any of the transporter/erector routes go through Colorado and if so, will any alterations to transportation facilities in Colorado be required?	Existing Minuteman transporter/erector routes pass through Colorado. These roads are not proposed to be used for the Peacekeeper project and therefore no alterations to transportation facilities will be required in Colorado for Peacekeeper operations.
983	The DEIS must also address the routes contemplated for the movement of hazardous and nuclear materials which in all likelihood will be transported through Colorado along the densely populated Interstate 25 corridor.	It is likely that some of the routes for transporting nuclear materials will go through Colorado. It is the responsibility of the Department of Energy to ship the materials, and the exact routes and mode of travel are sensitive. The transportation will be the same as that used today for the Minuteman system. For further information, please see Section 1.6.1 and Section 1.6.10 of the FEIS.
984	The proposed action involves transportation of the Peacekeeper using a stage transporter which is much larger and heavier than the existing Minuteman transporter. What will be the cost of improving and maintaining state and county roads during and after deployment and who will bear the costs?	As stated in Section 1.6.3.4 of the FEIS, the Department of Defense will pay for the cost of improving the roads used by the stage transporter. The Department of Defense will also pay for maintenance and repair costs generated by project-related construction vehicles on routes not used by the stage transporter. After deployment, the Department of Defense will be responsible for extraordinary maintenance and the counties will be responsible for routine maintenance. Costs will be determined during the Defense Access Roads study process.
985	What kind of minimum specifications will be given to the highway departments for upgrading roads and	Air Force vehicle specifications were provided to the States of Wyoming and Nebraska. These

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	who will supply them?	states developed roadway design specifications to meet these vehicle specifications.
986	Why were impact assessments for roads not broken down to individual counties? The aggregated impacts do not give a true reflection for Banner County.	Impact assessments were made for individual counties and for all counties together. Roadway impact assessments for all counties together are in Section 3.1.9.4.1.2 of the FEIS and Section 3.5.1.2.2 of the Final Transportation EPTR. The individual county assessments are in Sections 3.5.1.2.2.1 through 3.5.1.2.2.6 of the Final Transportation EPTR, Sections
987	It is mentioned that a new interchange would be on I-80 for alternative R-3. If this alternative were selected, an access control approval would be required from the Federal Highway Administration.	Noted.
988	Increased traffic volumes on rural road systems are more significant than indicated in the DEIS.	Every effort was made to accurately reflect the actual conditions that will exist due to the project actions. For further information, please see Section 3.1.9.2 of the FEIS and Sections 3.5.1.2.2, and 3.5.1.2.2.1 through 3.5.1.2.2.6 of the Final Transportation EPTR.
989	Transportation routes and the condition of those routes for construction equipment and materials to be delivered to the sites should be addressed.	An analysis has been conducted of material sites and associated optimal haul routes to project sites. While general route conditions were appraised during the environmental study, specific haul route pre-condition and post-condition studies will be made under the Defense Access Roads study process. For further information, please see 3.1.9.4.1.2 of the FEIS and Section 3.5.1.2.2 of the Final Transportation EPTR.
990	Due to the housing emphasis in South Cheyenne in the DEIS, areas of College Drive will suffer greater impact than indicated in the report. Of particular importance is bicycle and pedestrian traffic and the safety of children going to and from school.	Housing emphasis has shifted away from South Cheyenne and very little impact is now expected in the College Drive area. Pedestrian facilities are currently inadequate in South Cheyenne. Pedestrian concerns, including school safety, are covered for all areas of Cheyenne in Section 3.1.9.4.5 of the FEIS and Section 3.5.5 of the Final Transportation EPTR.
991	The Wyoming Highway Department emphasises that design work must be started in January 1984 if	Noted.

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	modifications are to be made within the Air Force time frame.	
992	The Nebraska State Engineer reviewed the DEIS and submitted a draft of the Defense Access Road needs study to the Federal Highway Administration and the Air Force.	Noted.
993	A major deficiency of the DEIS is its failure to address the timing of mitigation actions.	Included in the FEIS are schedules for identified mitigation measures. For further information, please see Section 3.1.9.6 of the FEIS.
994	The DEIS fails to address increased maintenance of urban roadways or accelerated deterioration of urban roadways due to increased traffic loads.	These issues have been addressed for roadways in the Cheyenne area in Section 3.1.9.4.1.1 of the FEIS and Section 3.5.1.1.2.1 of the Final Transportation EPTR.
995	Hazardous driving conditions due to dust caused by construction activities were not included.	Short-term adverse impacts during roadway construction are unavoidable. For further information, please see Section 3.1.9.4.1.2 of the FEIS.
996	During adverse weather conditions, increased traffic volumes on the gravel roads will increase safety hazards.	Driving conditions can be hazardous during bad weather, and with traffic increases, the possibility of accidents will increase. Traffic due to construction activities will have short term adverse impacts on safety in the area. For further information, please see Section 3.1.9.4.1.2 of the FEIS.
997	Why are time estimates for road closures and traffic delays due to widening, resurfacing and bridge construction not specified and considered in assessing impacts in Kimball and Banner counties?	Occasional delays can be expected by all road users in the project area during road construction activities which range from negligible to moderate in the level of impact. For further information, please see Sections 3.1.9.4.1.2 and 3.1.9.2.1.5 of the FEIS.
998	The DEIS does not indicate the precise effectiveness of mitigation measures, such as those related to traffic level of service increases.	Mitigation measures presented in the FEIS would be effective in raising the level of service to at least minimum design standards. Detailed engineering studies would be necessary to determine precise improvements and level of service changes.
999	The City of Cheyenne Traffic Engineer provided an expanded list of mitigation measures for	The mitigations proposed by the City Traffic Engineer have been given full consideration.

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	Cheyenne.	With the revised population distribution in Cheyenne, all of the suggested mitigation measures may no longer be applicable. For further information, please see Section 3.1.9.6 of the FEIS.
1000	The City of Cheyenne Traffic Engineer requested sufficient mitigation funds for needed road improvements.	Under the Memorandum of Agreement among the Secretary of Defense and the Governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system. This group will consider roadway mitigation funding.
1001	Why were urban standards used for rural roads and what would be the impacts if rural standards are applied?	In the FEIS, rural standards were applied. It is concluded that delay impacts will be moderate and significant. For further information, please see Section 3.1.9.2.1 and 3.1.9.4.1.2 of the FEIS.
1002	The transportation model assumes most future residential development will occur in South Cheyenne. Should residential development policies change, then the traffic analysis would have to be modified.	The analyses of population distribution and traffic have been revised with less emphasis on the South Cheyenne area. For further information, please see Section 3.1.9.4.1.1 and Section 3.1.9.6 of the FEIS, and Appendix A of the Final Transportation EPTR.
1003	The DEIS identifies a number of locations in Cheyenne which will experience a high level of impact but does not propose corresponding mitigation measures.	Mitigation measures for these intersections are addressed in Section 3.1.9.6 of both the DEIS and the FEIS.
1004	The report does not discuss the time required for design and construction of roadway improvements. This must be considered so that construction does not interfere with the traffic demand it is supposed to be helping.	Noted.
1005	Signalization improvements alone will not solve problems predicted along Pershing Boulevard and Logan Avenue, geometric improvements will be necessary.	Geometric improvements are now identified as mitigation options where necessary, along with signalization improvements. For further information, please refer to Section 3.1.9.6 of the FEIS.
1006	Geometrics on improved county roads must be consistent with an acceptable design speed or the	Noted.

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	statement "improved safety on rural roads" is probably erroneous.	
1007	Exception is taken with the statement that there is no residual or unavoidable adverse impact resulting from the project.	The FEIS now notes that short-term adverse impacts due to road construction are unavoidable.
1008	With many trucks using the roads, there will be a safety problem and a lot of dust causing visibility problems.	When considered on a county-wide basis, the number of trucks is not large and problems due to truck traffic are expected to be small. For further information on truck traffic volumes, please see Section 3.1.9.4.1.2 of the FEIS and Section 3.5.1.2.2 of the Final Transportation EPTR.
1009	Specific roads recommended for upgrading are: Pumpkin Creek Road and Stegall Cut-off.	Specific roads to be upgraded will be determined during the Defense Access Roads study process. For further information concerning the Defense Access Roads study process, please see Appendix B of the Final Transportation EPTR.
1010	The Village of Dix Board of Trustees are "particularly concerned about the three miles North of the Village of Dix to join the two miles of CF-3 road and then four miles North to F-1. And also, the road from the Village of Dix South to K-1." These roads should be hard-surfaced.	The surfacing of Defense Access Roads will be determined during the Defense Access Road study process. For further information, please see Appendix B of the Final Transportation EPTR.
1011	The routing of vehicles to and from F.E. Warren AFB was not adequately addressed.	Traffic routes to and from the base are considered in Section 2.5.1.1.4 of the Final Transportation EPTR and the anticipated construction truck traffic into the base is detailed in Section 3.5.1.1.2.1 of the Final Transportation EPTR.
1012	Will there be an increase in the use of helicopters and is there a way to minimize the disturbance they create?	While helicopters may be utilized to shuttle personnel and supplies to the launch facilities, it is anticipated that these operations will be infrequent. This is discussed in Section 3.1.9.4.3.2 of the FEIS and Section 3.5.3.2 of the Final Transportation EPTR.
1013	The Cheyenne Airport analysis is based on an outmoded and unrealistic Master Plan.	The analysis of the Cheyenne Airport included consideration of the current Master Plan in addition to other independent evaulations. For further information, please see Sections

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		2.1.9.2.3.1, 3.1.9.4.3.1 and 3.1.9.4.3.2 of the FEIS.
1014	Peacekeeper impacts will accelerate the deterioration of already marginal runway pavement at the Cheyenne Airport. This should be mitigated with Air Force or Federal Aviation Administration funds.	Project-related activities will not significantly increase the rate of deterioration of the runway pavement at the Cheyenne Airport. For further information, please see Section 3.1.9.4.3.2 of the FEIS, Sections 3.5.3.1.1.3 and 3.5.3.2.1.1 of the Final Transportation EPTR.
1015	The project will accelerate the need for additional parking at the Cheyenne Airport and cause an even greater increase in demand.	Project-related activities will not appreciably increase demand for parking facilities at the Cheyenne Airport. For further information, please see Sections 2.1.9.2.3.1 and 3.1.9.4.3.1 of the FEIS and Sections 3.5.3.1.1.3 and 3.5.3.2.1.1 of the Final Transportation EPTR.
1016	Enlargement of the Cheyenne Airport passenger terminal will be required by the project.	Project-related activities will not require that the airport passenger terminal be enlarged. The airport passenger terminal will require expansion in the future without the project. For further information, please see Sections 3.1.9.4.3.1 and 3.1.9.4.3.2 of the FEIS and Sections 3.5.3.1.1.3 and 3.5.3.2.1.1 of the Final Transportation EPTR.
1017	In the Transportation Section, page 2-59, it should read "The Army Guard operates eight UH-1H helicopters, six OH-58A helicopters, and one T42 Beechcraft Baron Twin-engine airplane."	This is correct and the text has been changed accordingly in Section 2.1.9.2.3.1 of the FEIS.
1018	The Nebraska Department of Aeronautics is not aware of any Federal Aviation Administration restrictions of flight level operations over silos as indicated by the Air Force. Existing air routes should be studied if the Air Force restricts air operations over the silos.	The Federal Aviation Administration does not restrict flight over missile launch facilities. The requirements will remain in force over the area. For further information, please see Section 3.1.9.4.3.2 of the FEIS.
1019	The Nebraska Department of Aeronautics notes that agriculture was not addressed in the Jurisdictional EPTR with respect to crop spraying aircraft.	There is no project related activity that will interfere with crop spraying.
1020	Non-work related trips should be included in the public transit analysis.	The analysis is based on all workers and includes non-work trips. For further information, please see Section 3.5.4.2 of the Final Transportation EPTR.

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1021	In reference to the levels of impact for safety, is it possible to have $200 worth of damage in a pedestrian or bicyclist accident with no injuries?	It is not probable that an accident with $200 worth of damage would result in no injuries to the pedestrian or bicyclist involved. In the impact analysis, the $200 property damage figure is associated with injuries. The $200 property damage figure was used as a monetary baseline to distinguish low impacts from moderate and high impacts. No injuries were associated with property damage of less than $200; injuries were associated with property damage over $200. For further information, please see Sections 3.1.9.2.5 and 3.1.9.2.1.6 of the FEIS.
1022	Paragraph 4 of Section 3.5.1.2.1.5 discusses projected traffic volume and road capacity. The Banner County Board of Supervisors takes issue with the projected count and the statement that the volumes will be considerably lower than the baseline volumes.	The statement has been corrected to read that the traffic volumes will be considerably lower than the capacity of the roadways. For further information, please see Sections 3.5.1.2.1.1 through 3.5.1.2.1.6 of the Final Transportation EPTR.
1023	Paragraph 6 of Section 3.5.1.2.1.5 states "under no action, it was assumed that Minuteman transporter erector routes would continue to be used during baseline years and their physical conditions would remain essentially unchanged." The roads in Banner County are not nearly adequate to provide access to the Minuteman complex, or later to the Peacekeeper complex. At all times there may be a need.	The existing transporter erector routes are subject to normal maintenance operations to assure access to the launch facilities. No plans exist to provide hard-surfacing for Minuteman programs. The Defense Access Road study process is discussed in Appendix B of the Final Transportation EPTR.
1024	Why were the population and traffic increases for Harrisburg considered negligible and thus did not warrant further study?	No population increase is anticipated for Harrisburg as a result of this project, and it is not anticipated that Harrisburg will attract many trips. Any traffic increases would likely be a result of nearby road construction or launch facility modification work. The nearest existing transporter/erector route to Harrisburg, identified during the study as link 313, has been recommended for removal from the transporter/erector system by state and local officials. Analysis indicates that the existing roadway system in Harrisburg could accommodate the anticipated traffic with no changes in traffic level of service.

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1025	The movement of agricultural products to market or storage has a very definite impact on Banner County road usage and must be counted in a traffic determination and will not be revealed in the average count.	Further studies concerning agricultural-related traffic during the harvest season indicate that peak day traffic may be much higher than the Average Daily Traffic figure. This has been taken into consideration in the analysis. For further information, please see Section 9.4.4.2 of the Final Jurisdictional EPTR.
1026	An all-weather road surface must be provided to allow adequate movement of missile traffic at all times, even though operational requirements may not be any greater than the present requirements.	The surfacing of Defense Access Roads will be determined based on life cycle costs, Air Force requirements and projected traffic. For further information, please see Section 3.1.9.4.1.2 of the FEIS, Section 9.4.4.3 of the Final Jurisdictional EPTR, and Appendix B of the Final Transportation EPTR.
1027	It is not possible to find the necessary aggregate of the quality needed to provide the aggregate base suggested for upgrading the gravel roads anywhere in western Nebraska. Crushed rock would have to be hauled from the adjoining State of Wyoming at tremendous expense.	Potential aggregate pits, with satisfactory quality and quantity, were identified in both Nebraska and Wyoming. Aggregate quantities were based on preliminary design estimates, and represent maximum numbers that may well be reduced during final roadway design. For further information, please see Section 3.1.9.4.1.2 of the FEIS, Section 9.4.4.3 of the Final Jurisdictional EPTR, and Section 3.5.1.2.2 of the Final Transportation EPTR.
1028	Paragraph five of Section 9.4.4.3 discusses road standards for road surface type and width. These standards do not meet the requirements of the Nebraska Board of Classification and Standards.	The road standards mentioned in Section 9.4.4.3 were based on preliminary evaluations of existing gravel roads, and improvements necessary to enable them to accomodate Peacekeeper vehicles. An evaluation by the Military Traffic Management Command provided more detailed information on final design standards and did use specifications satisfactory to Nebraska. For further information, please see Section 3.1.9.4.1.2 of the FEIS, Section 9.4.4.3 of the Final Jurisdictional EPTR, and Section 3.5.1.2.2 and Appendix B of the Final Transportation EPTR.
1029	Population estimates used in the baseline and impact parts of the analysis are not stated. Was the traffic analysis based only on current population figures? Also, were weekly commuters	The traffic analysis was based on population figures associated with the project impact. Weekly commuters were included in the analysis. For further information, please see Appendix A

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	included in the analysis?	of the Final Transportation EPTR.
1030	The graphics used to depict transportation information are of poor quality.	Many of the transportation graphics have been revised
1031	How were the potential growth areas in Cheyenne, as shown on Figure 3.2.10-4 of the Draft Jurisdictional EPTR designated?	The Cheyenne-Laramie County Regional Planning Office designated the potential growth areas in the Cheyenne Urban Area.
1032	The legend of Figure 3.2.10-12 of the Draft Jurisdictional EPTR has not been completed.	This has been corrected in Figure 3.2.10-12 of the Final Jurisdictional EPTR.
1033	In Figure 3.2.10-21, the traffic volume on Interstate 25 near Happy Jack Road is incorrect.	This has been corrected in the Final Jurisdictional EPTR.
1034	Riner viaduct no longer exists.	This has been corrected in the Final Jurisdictional EPTR.
1035	Figures 3.2.10-19 and 3.2.10-17 in the Draft Jurisdictional EPTR have the same title.	The correct title for 3.2.10-19 is "1985 Estimated Traffic Projections in the Cheyenne Area with Project". This has been corrected in the Final Jurisdictional EPTR.
1036	The transportation impacts of new population in South Cheyenne are not addressed.	The effects of new population in South Cheyenne were addressed in Section 3.2.10.1.3 of the Draft Jurisdictional EPTR. These effects have since been updated to include redistribution of the project-related population with less emphasis in South Cheyenne. For further information, please see Section 3.2.10.1.3 of the Final Jurisdictional EPTR.
1037	If inmigration to South Cheyenne is restricted, then many of the assumptions in the Draft Jurisdictional EPTR are invalid.	The analyses of population distribution and traffic have been revised with less emphasis on the South Cheyenne area. For further information, please see Sections 3.1.9.5 and 3.1.9.6 of the FEIS, and Appendix A of the Final Transportation EPTR.
1038	The report is overly cautious in stating transportation impacts and noncommital in stating mitigation measures to be implemented.	In the FEIS, every effort has been made to carefully evaluate and accurately report transportation impacts resulting from project activities. In addition, the FEIS lists mitigation measures for consideration. The effect of these mitigations and their timing is now included in

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		Section 3.1.9.6 of the FEIS.
1039	Funding assistance for transportation improvements will have to be provided if they are to be implemented.	Under the Memorandum of Agreement among the Secretary of Defense and the Governors of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system. This group will consider roadway mitigation funding.
1040	The Military Traffic Management Command report should lead to agreement on Defense Access Road improvements.	The evaluation of Defense Access Roads was performed in a cooperative manner and included state and local agencies. This evaluation was forwarded from FHWA to Military Traffic Management Command for a final decision on the Defense Access Roads. For an explanation of the Defense Access Roads process, please see Appendix B of the Final Transportation EPTR.
1041	Project activites may cause delays in transporting agricultural products to market. Delays in transporting livestock may cause weight loss. These issues were not addressed.	The effects on agricultural traffic have been studied in the FEIS. Construction activities will have short term adverse impacts, including delays, on traffic flow. For further information, please see Section 3.1.9.4.1.2 of the FEIS and Sections 3.10.6.2, 3.10.6.3, 4.9.6.2, 4.9.6.3, 5.9.6.2, 5.9.6.3, 7.7.5.2, 7.7.5.3, 8.14.5.2, 8.14.5.3, 9.4.4.2, and 9.4.4.3 of the Final Jurisdictional EPTR.
1042	Level of service categories for transportation are not defined.	Levels of service are defined in Section 3.1.9.2.1.1 of the FEIS.
1043	The transportation of construction materials was neglected. These should be analyzed in terms of traffic levels and physical condition of roadways.	This has been incorporated in the Final Jurisdictional EPTR based on likely material sites and associated haul routes to construction sites. For further information, please Section 3.1.9.4.1.2 of the FEIS and Sections 3.2.10.1.1, 3.10.6.3, 4.9.6.3, 5.9.6.3, 7.7.5.3, 8.14.5.3, and 9.4.4.3 of the Final Jurisdictional EPTR.
1044	The consequences of level of service reductions are not considered in the City of Cheyenne discussion.	The consequences of level of service reduction are addressed in Section 3.1.9.4.1.1 of the FEIS and Table 3.5.1.1 of the Final Transportation

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		EPTR.
1045	Transportation and road maintenance needs should be considered.	Transportation and road maintenance have been fully considered in the FEIS, the Final Transportation EPTR and the Final Jurisdictional EPTR.
1046	Mitigations for roads (other than transporter/erector routes) used as haul routes during Peacekeeper construction should consist of substantial upgrading rather than maintenance only.	The Department of Defense will maintain and repair the non-transporter/erector routes impacted by project-related construction vehicles. The roads will not be substantially upgraded as their use for the Peacekeeper project is of limited duration. Other funding programs (state, county, local) are more appropriate for upgrading these roads. For further information, please see Sections 3.1.9.4 and 3.1.9.4.1.2 of the FEIS and Section 3.10.6.3 of the Final Jurisdictional EPTR.
1047	The Superintendent of the Cheyenne Sanitation Department favors paving county roads adjacent to existing city limits.	Noted.
1048	In Section 3.2.10.1.1 of the Draft Jurisdictional EPTR, the statement on jurisdiction of county roads is confusing.	County roads include those under the full jurisdiction of the County, as well as those only maintained by the County.
1049	Planned improvements indicated on Figure 3.2.10-6 of the Draft Jurisdictional EPTR are incorrect.	This figure has been corrected in the Final Jurisdictional EPTR.
1050	Will there be impacts to roadway surface conditions in Cheyenne due to the project?	With a predicted increase in traffic due to the project, roadway deterioration will slightly accelerate. For further information, please see Section 3.1.9.4.1.1 of the FEIS and Section 3.2.10.1.3 of the Final Jurisdictional EPTR.
1051	Mitigation measures for the intersections of 19th-Converse-Pershing, and Windmill and Dell Range should be removed from the study as project impact should not require modifications to these intersections.	The mitigations for Windmill and Dell Range have been removed. However the mitigation for the 19th-Converse-Pershing intersection is retained for consideration due to the revised population distribution in Cheyenne. For futher information, please see Section 3.1.9.6 of the FEIS, Section 3.2.10.1.4 of the Final Jurisdictional EPTR and Section 3.7 of the Final Transportation EPTR.
1052	The reference in the Draft Jurisdictional EPTR on Figure 3.2.10-8 to "Missile Drive to Deming Drive"	This reference refers to the transportation link a motorist would use going from Missile Drive

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	does not make sense.	south across 16th Street to Deming Drive.
1053	The proposed traffic signal at Prairie Avenue and Sunset Drive is missing from Figure 3.2.10-8 of the Draft Jurisdictional EPTR.	This has been corrected and is shown in Figure 3.2.10-7 in the Final Jurisdictional EPTR.
1054	Dell Range Boulevard and Pershing Boulevard corridors may require greater attention if the northern and eastern parts of the urbanized area experience project growth.	These two corridors have been reanalyzed, based on revised population distributions. The findings are presented in Section 3.1.9.4.1.1 of the FEIS and Section 3.2.10.1.3 of the Final Jurisdictional EPTR.
1055	Is the analysis in Section 3.2.10.1.3 of the Draft Jurisdictional EPTR based on all workers or just the base workers? Are there trips other than work-related? Are other inmigrants considered?	Analysis is based on all workers and includes nonwork trips. Both direct and indirect inmigrants are considered. Level of service reductions are primarily caused by base-oriented worker trips. For further information, please see Appendix A of the Final Transportation EPTR.
1056	When will the additional baseline traffic study on traffic corridors and intersections be done, as indicated in the Draft Jurisdictional EPTR?	The planning and programming for additional baseline traffic study efforts are the responsibility of local government. However, when required as a direct result of the project, necessary improvements are identified as part of the mitigations listed.
1057	The interchange of Interstate 25 and College Drive is in need of mitigation measures.	Based on the redistribution of project-related population and the updated traffic analysis, no level of service reductions are expected at this interchange. Therefore, mitigation measures have not been included. The updated analysis is presented in Section 3.1.9.4.1.1 of the FEIS and Section 3.2.10.1.3 of the Final Jurisdictional EPTR.
1058	Yellowstone Road is not marked on Figure 3.2.10-1 of the Draft Jurisdictional EPTR.	This has been corrected and is shown in Figure 3.2.10-1 of the Final Jurisdictional EPTR.
1059	Transportation mitigation measures in South Cheyenne are weak or absent.	Due to the revised population distribution within Cheyenne, South Cheyenne impacts are substantially reduced. Therefore no specific mitigations are considered necessary.
1060	The LaGrange Town Council is anxious that the road and highway situation be clearly studied.	Based on anticipated project-related population increases and increases in project-related

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		traffic, road impacts in LaGrange will be negligible.
1061	The report does not reach a conclusion concerning the cost of rural road improvements during the construction and post-construction phases of the project.	Once road surfacing requirements have been determined through the Defense Access Roads study process, precise costs and specific responsible agencies will be identified. The Department of Defense will pay for the cost of improving the roads used by the stage transporter. The Department of Defense will also pay for maintenance and repair costs generated by project-related construction vehicles on routes not used by the stage transporter. After deployment, the Department of Defense will be responsible for extraordinary maintenance and the counties will be responsible for routine maintenance. For further information, please see Section 3.1.9.4 of the FEIS, Section 3.10.6.3 of the Final Jurisdictional EPTR, and for information on the Defense Access Roads study process see Appendix B of the Final Transportation EPTR.
1062	Estimated volume of rail traffic attributable to the project is not included. Traffic levels at grade crossings and length of delays are not addressed.	This analysis has been included in Section 3.2.10.4.3 of the Final Jurisdictional EPTR. Delays at at-grade railroad crossings will have a low and not significant impact, as stated in Section 3.1.9.4.2.2 of the FEIS.
1063	The use of "negligible" in the railroad discussion for Cheyenne is unclear.	As discussed in Section 3.1.9.4.2.2 of the FEIS, delays at rail crossings have a low (changed from negligible) and not significant impact. For definitions of impact for delays, please see Section 3.1.9.2.1.4 of the FEIS.
1064	Figure 3.2.10-26 of the Draft Jurisdictional EPTR should be reoriented with North at the top.	Due to the size and shape of the figure, the present orientation provides the best graphic clarity.
1065	Runway lengths are incorrectly listed for the Cheyenne Airport.	These inaccuracies have been corrected. For further information, please see Section 3.2.10.5.1.2 of the Final Jurisdictional EPTR.
1066	Assuming that project-related aviation operations will be spread over the day rather than at peak hours is unacceptable.	Peak hour project operations were considered in the analysis. As stated in Section 3.2.10.5.3.1 of of Jurisdictional EPTR, the highest project-

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		related hourly peak has 95 aircraft operations. This is less than the capacity of the minimum capacity runway at the Cheyenne Airport.
1067	Impacts to the Cheyenne Airport will be larger than anticipated by the report.	The impacts are considered to be accurate based on the analysis contained in Section 3.2.10.5.3 of the Final Jurisdictional EPTR.
1068	Additional transportation mitigations should be considered. These include approach radar at the Cheyenne Airport, and extending control tower operation hours.	These mitigations are not required to ameliorate project-induced impacts.
1069	Costs of additional aviation apron space should be estimated.	Two options are addressed; both depend upon contractors using helicopters during the construction period. Costs would be covered by contractors. If the use of helicopters is unnecessary, no additional apron space will be required. For further information, please see Section 3.1.9.4.3.2 of the FEIS and Section 3.2.10.5.3.1 of the Final Jurisdictional EPTR.
1070	Mass transit in the City of Cheyenne needs more analysis.	Cheyenne has minimum transit with very low ridership. It is very doubtful if project-related inmigrants, with relatively high incomes, will utilize this transportation service. Further analysis does not appear warranted. For further information, please see Section 3.1.9.4.4 of the FEIS, Section 3.2.10.2 of the Final Jurisdictional EPTR, and Section 3.5.4.2 of the Final Transportation EPTR.
1071	More analysis is needed of the potential for providing mass transit for the project-related workforce.	While it does not appear that public transit would be usedful for the project workforce, the use of high occupancy vehicles, such as van pools or car pools, for project-related employees is included as a mitigation. For further information, please see Section 3.1.9.6 of the FEIS and Section 3.2.10.1.4 of the Final Jurisdictional EPTR.
1072	Adequate mention is not made of the City of Cheyenne's and Wyoming Highway Department's recent efforts concerning bike paths.	These efforts have been recognized and are mentioned in Sections 2.1.9.2.5 and 3.1.9.4.5.; of the FEIS and Section 3.2.10.3 of the Final Jurisdictional EPTR.
1073	Mitigation measures for pedestrian and bicycle facilities are not addressed.	The project-related impact on pedestrian and bicycle facilities is minimal, and therefore

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		mitigations are not required. For further clarification, please see Sections 2.1.9.2.5, 3.1.9.4.5.1 and 3.1.9.4.5.2 of the FEIS and Section 3.2.10.3 of the Final Jurisdictional EPTR.
1074	Table 3.2.10.2 of the Draft Jurisdictional EPTR does not correlate with the text, listing 5 accidents	The text has been revised to clarify this point. For further information, please see Section 3.2.10.1.1 of the Final Jurisdictional EPTR.
1075	Calling the Village Creek South project an "intense" interior bike and pedestrian network is misleading	The term "intense" has now been removed from all documents. For further information, please see Section 3.1.9.4.5.1 of the FEIS and Section 3.2.10.3.1 of the Final Jurisdictional EPTR.
1076	Each section of the Jurisdictional EPTR on county roads concludes with the statement that there is no need to propose more specific mitigations since other impacts will be addressed during project construction and operation. This [illegible] the rationale for impact planning	The phrase in question has been deleted from the Final Jurisdictional EPTR. This question refers to the maintenance of non-transporter/erector routes which may be impacted by project-related construction vehicles. The Department of Defense will pay for these specific maintenance costs during the construction period.
1077	The [illegible] or rebuilding of roads and existing bridges would result in temporary delays in shipping of oil or result in a slightly longer routing. The movement of drilling and well workover equipment would also be affected during this construction period	Occasional delays can be expected by all road users in the project area during road construction activities which will range from negligible to moderate in the level of impact. For further information, please see Section 3.1.9.4.1.2 of the FEIS, Sections 3.10.6.3, 4.9.6.3, 5.9.6.3, 7.7.5.3, 8.14.5.3, and 9.4.4.3 of the Final Jurisdictional EPTR, and Section 3.5.1.2.2 of the Final Transportation EPTR.
1078	No estimated costs are given for the increased maintenance of transporter/erector routes. Who will be responsible for these increased costs?	Once roadway requirements have been determined through the Defense Access Roads study process, precise costs and specific responsible agencies will be identified. After deployment, the Department of Defense will be responsible for extraordinary maintenance and counties will be responsible for routine maintenance. For further information, please see Appendices B and C of the Final Transportation EPTR.
1079	Specific [illegible] regarding the routing and roads to be [illegible] by the transporter/erector vehicle are not addressed.	The stage transporter vehicle specifications are detailed in Section 1.6.1 of the FEIS and Section 3.1.1.2.3.2 of the Final Transportation EPTR. The

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		stage transporter vehicle will use existing transporter/erector routes wherever possible though some small changes have been proposed to the existing routes. These changes are detailed in Sections 7.7.5.3 and 9.4.4.3 of the Final Jurisdictional EPTR. A map showing existing transporter/erector routes and other project-related routes is included as Figure 2.5.1-3 in the Final Transportation EPTR. For further information, please see Section 3.1.9.4 of the FEIS.
1080	The timeline for the analyses of structural deficiencies identified in the DEIS has not been established. Who will pay for the time and resources state and county employees will spend in doing the analyses?	These analyses have been accomplished within the jurisdiction of the Military Traffic Management Command (MTMC) in the Defense Access Roads study process. The MTMC is providing for reimbursement of state expenses in estimating roadway and bridge needs.
1081	Concern is expressed that the assessment of bridges, called for in the DEIS, has not been carried out. Rural residents would experience considerable hardship and delay in travelling if a bridge was out of commission for even a week.	The Defense Access Roads study, including the assessment of road and bridge needs, has been undertaken by the Military Traffic Management Command in cooperation with state and local officials. Bridge deficiencies are referenced in Section 3.1.9.4.1.2 of the FEIS under structural deficiencies. Delays associated with roadway improvements (including bridge improvements) will have a moderate and significant impact.
1082	Page 7-78 of the Draft Jurisdictional EPTR should be 2.5 percent instead of 25 percent. Average annual growth rates for rural state highways should be 2.5 percent instead of 25 percent as listed.	This has been corrected. For further information, please see Section 7.7.5.2 of the Final Jurisdictional EPTR.
1083	There may be a significant increase in traffic on county roads during the peak construction years in Banner County that should be recognized.	The actual volumes anticipated during construction activities are well within the capacity of existing roadways. However, adverse traffic delays will be encountered. For further information, please see Section 9.4.4.3 of the Final Jurisdictional EPTR.
1084	Concern is expressed that the missiles will be transported in three or four parts, thus increasing the number of heavy loads. No mention	Analysis of transporter/erector routes considered both the total weight of the vehicle and missile, as well as the total number of trips necessary for

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	was made in the DEIS about the removal of Minuteman missiles. Concern is further expressed over the periodic replacement of missiles and continuing security measures.	Minuteman removal and Peacekeeper deployment. For further information on Peacekeeper deployment and Minuteman III missile removal, please see Sections 1.6.3.1 and 1.6.8 of the FEIS.
1085	The State Highway 71 bridge clearance is incorrect.	The correct clearance is 13'6". This has been incorporated in the final analysis.
1086	No reference could be found to the use of Kimball streets as part of the route for the stage transporter.	As discussed in Section 3.1.9.4.1.2 of the FEIS, several design options exist to the use of the current transporter/erector route in Kimball. The design options are studied since the existing Kimball railroad bridge over Nebraska State Highway 71 has an inadequate clearance for the stage transporter.
1087	Traffic counts and projected road impact analysis on Banner County roads was insufficient. The two days of traffic counts in Banner County conducted for the analysis was insufficient.	A detailed study of Launch Facility associated roads was carried out in Banner County as well as in all counties in which the Peacekeeper will be deployed. Short-term traffic counts (48 hours) are typically used, with appropriate seasonal factors, to determine average daily traffic volumes. Traffic is much higher during harvesting season. For further information, please see Section 3.1.9.4.1.2 of the FEIS. The impacts due to the project are also discussed in this section. For further discussion of the results of the road study in Banner County, please see Section 9.4.4.1 of the Final Jurisdictional EPTR.
1088	The reference to Interstate 71 in Chapter 9, should read "State Highway 71".	The text has been revised to correct this.
1089	Page 7-79 of the Draft Jurisdictional EPTR refers to a 24-foot width of surface and shoulder. This statement can be misleading. Does it mean 24 feet overall, or 24 feet of surfacing and additional shoulder?	It was intended to mean 24 feet overall. It is difficult to define the shoulder area on a gravel road. This referenced a 24 foot overall gravel section of surface and shoulder.
1090	The study emphasized impacts in the Cheyenne area. The impact of transporting the missile on rural roads is of concern.	A detailed analysis of these impacts on the transportation network was carried out. The Air Force provided stage transporter vehicle specifications to the states. The respective states then developed appropriate design standards and made specific road improvement proposals. For

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		further information, please see Section 3.1.9.4.1.2 of the FEIS and Sections 3.10.6.3, 4.9.6.3, 5.9.6.3, 7.7.5.3, 8.14.5.3 and 9.4.4.3 of the Final Jurisdictional EPTR.
1091	The effect of additional traffic on the City of Scottsbluff was not adequately addressed.	The impact of project-related traffic in Scottsbluff has been reevaluated and increases in traffic in Scotts Bluff County will occur due to aggregate haulage and other project-related activites. The anticipated project-related population increases in the City of Scottsbluff and the associated traffic increases are small and level of service changes for roads within the city are negligible. For further information, please see Section 8.14.5.3 of the Final Jurisdictional EPTR and Section 3.5.1.1.2.6 of the Final Transportation EPTR.
1092	At what time of the year will the transporter/erector route construction take place? Will farmers find roads to market blocked when most needed?	The improvements to the roads and bridges will take place during the normal construction season, which typically excludes the winter months. Moderate and significant delays may occur during periods of roadway construction. Traffic is much higher during the harvest seasons and this contributes to the problem. For further information, please see Section 3.1.9.4.1.2 of the FEIS, Sections 3.10.6.3, 4.9.6.3, 5.9.6.3, 7.7.5.3, 8.14.5.3 and 9.4.4.3 of the Final Jurisdictional EPTR and Section 3.5.1.2.2 of the Final Transportation EPTR.
1093	The section on Kimball Airport does not mention the needed improvements identified by the National Airport System Plan prepared by the Department of Transportation.	The plan has been reviewed and incorporated in the analysis. For further information, please see Section 3.1.9.4.3.1 of the FEIS and Section 7.2.10.2 of the Final Jurisdictional EPTR.
1094	The runway length is incorrect for Laramie Airport. The information concerning the types of aircraft based there is also incorrect.	Laramie Airport is not addressed in the FEIS, Final Jurisdictional EPTR, or Final Transportation EPTR as it is not considered to be within the project's Region of Influence.
1095	The description in Appendix A of Volume III of the Draft Jurisdictional EPTR for characterizing road and traffic conditions is unacceptable.	Appendix A of the Draft Jurisdictional EPTR included a brief summary of methodology. Appendix A of the Final Transportation EPTR describes these methodologies in detail.

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1096	Future reclamation of mobile home parks should not be mandatory. They should be approved subject to the appropriate standards, without time restrictions. Reclamation could be an option open to the developers.	Reclamation is no longer being offered as a mitigation. Additional analysis indicates that baseline demand for mobile homes would be adequate to absorb project-induced excess supply. Therefore, high quality mobile home park development of a permanent nature should be approved, subject to appropriate standards. Additional mitigations are offered in relation to mobile home regulations and standards in Section 3.1.10.6.1 of the FEIS.
1097	The DEIS is deficient in impacts to agriculture, agricultural operations and rural life. Specific concerns are shooting and rustling of livestock and indirect impacts resulting from increased human population. Anticipate that personnel involved with project construction and operation are unfamiliar with rural settings. Livestock owners will be faced with additional problems relating to gates being left open in rural agricultural areas.	Subsequent to the DEIS new analyses were conducted. These issues are addressed and a series of detailed mitigation measures have been outlined. Specifically, an environmental awareness program has been offered as a mitigation and, if implemented, will include a discussion of landowner concerns. Program elements are outlined in Section 10.4 of the Final Jurisdictional EPTR. For further information, please see Section 3.1.10.6.2 of the FEIS and Section 3.7.1.2 of the Final Land Use EPTR. Section 3.1.6.6.2 of the FEIS suggests adding personnel to the Laramie County Sheriff's Department which, if implemented, should help reduce the potential for shooting and rustling of livestock.
1098	Concern over additional litter problems on farms and ranches due to increased project-related population increases.	Subsequent to the DEIS new analyses were conducted to address these issues. A series of detailed mitigation measures are offered. Specifically, environmental awareness programs have been offered for Air Force and contractor personnel involved with the project. One of the major elements of this program would be a discussion of environmentally responsible behavior, especially in regard to littering. For further information, please see Section 10.4 of the Final Jurisdictional EPTR and Section 3.7.1.2 of the Final Land Use EPTR.
1099	There will be an increase in fire danger with the arrival of a sizeable number of inmigrants. This is very important and of concern to rural people.	During the environmental impact analysis process it was determined that population increases in rural areas will not be great enough to increase fire hazards to any measurable degree. However,

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		envionmental awareness programs have been recommended for Air Force and subcontractor personnel and the Air Force is also committed to various mitigation measures that protect agricultural resources. For further information, please see Section 3.1.10.4 of the FEIS, Section 10.4 of the Final Jurisdictional EPTR and Section 3.2.2.1.2 of the Final Land Use EPTR.
1100	What is the impact to the people who live amidst the silos? What problems do they anticipate? What are the impacts to the rural lifestyle? Economic effects on agriculture were insufficiently addressed.	The rural land use and agriculture sections of the FEIS and the Final Land Use EPTR have been expanded to include a discussion of these concerns. Mitigation measures that treat such economic effects on agriculture as lost crops due to surface disturbance are also offered in the revised analysis. For further information, please see Section 3.1.10.4 of the FEIS and Section 3.2.2.1.2 of the Final Land Use EPTR. Subsequent to the DEIS, impacts to the rural lifestyle were revised to recognize that there will be some effect on rural lifestyle due to increased numbers of people in rural areas. For further discussion, please see Section 3.1.5 of the FEIS.
1101	The Land Use Subcommittee of the Mayor's Impact Committee offered an overview on the land use section of the DEIS to be followed by a written report.	Noted.
1102	Scotts Bluff County is considered to be within the Region of Influence for rural land use but not for urban land use. Why?	Scotts Bluff County is included in the Region of Influence for both urban and rural land use. The cities of Scottsbluff and Gering are not included in the analysis because project-related population increase in those communities is not large enough to create land use impacts.
1103	The cities of Sidney, Dix, Harrisburg, Scottsbluff and Morrill are all within the Region of Influence and should be considered.	Although these communities are within the Region of Influence, project-induced population growth within them would not be large enough to cause land use impacts.
1104	Analytical methods are inadequately disclosed. Local officials with whom discussions were held to determine land use trends for urban areas should	Analytical methods are covered in more detail and personal communications with local officials are listed in Sections 3.1.1.1 and 5.2 of the Final

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	have been disclosed.	Land Use EPTR.
1105	The Panhandle Resource Council (PRC) report used for the analysis of presently developed land in Kimball is 7 years old. The methodology used in the PRC analysis is not disclosed.	Subsequent to the DEIS, the land use survey data taken from the PRC report was updated based on 1983 housing counts, annexation data, and population trends. This information is incorporated in Section 2.1.10.2.1 of the FEIS.
1106	Will the 11 acres in Kimball required for mobile home parks/nonresidential use be available through the market or will condemnation proceedings be necessary?	Additional population, housing, and land use analysis has been conducted and incorporated into the FEIS. The analysis assumes that development will occur through the marketplace and that no condemnation for this purpose will be required.
1107	Effect of Launch Facility modification on land use should be considered. Short-term land use impacts due to safety hazards and incidental use of roadways during modification need to be analyzed.	Additional analysis has been conducted on rural road traffic and safety issues. For further information, please see Sections 1.6.10 and 3.1.9.4.1.2 of the FEIS.
1108	A monitoring program will be important and should be implemented before major problems occur. The monitoring program should be coordinated with the Planning Office.	Land use monitoring has been offered as a potential mitigation measure in the FEIS, although technically it would operate more as a reinforcer of other mitigation measures than as a mitigation itself. Implementation and timing are addressed in Section 3.1.10.6.1 of the FEIS.
1109	Land use is a quality-of-life question. Will changes in land use alter the quality of life? Is land adequate for future needs? Is project-related land use consistent with the character of the community and the goals toward which it is presently working?	The analysis assumes that project-related growth in communities would be located where it is compatible with existing uses and would comply with adopted plans, policies and regulations. Adequacy of land for future needs is addressed in relation to changes in the supply of vacant land. Underutilization of developed land addresses impacts during the decline cycle.
1110	If the issues listed for determination of significance are used in the analyses, it is not understood how the DEIS concludes that there will be no significant land use impact.	Additional analysis of population, housing growth and resulting land use changes has been conducted. Projections indicate that local capacity generally exists in communities to absorb land use demand. Some underutilization could occur during the decline cycle, but not enough to be considered significant.
1111	Actual land use patterns and data often do not conform to "generally accepted standards." These	There are a number of acceptable projection procedures which are used in land use planning

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	standards have changed significantly over time. It is incorrect to assume that new growth will require development according to these general standards.	and analysis. Standards used in this analysis consider the amount of land that would normally be required to accommodate population growth. Actual land use patterns and standards may not be adequate to project future needs since there may be deficiencies or an oversupply at any given time.
1112	More urban land use impacts need to be recognized as important, thus requiring more mitigation measures.	Those impacts believed to be the most important in relation to urban land use during the growth and decline cycles have been identified. Additional mitigation measures have been offered, and are included in Section 3.1.10.6.1 of the FEIS.
1113	Statement that agriculture is not a dynamic operation is incorrect. Fewer people may be actively involved in agriculture, but the size of operation and specialization has certainly increased.	Noted.
1114	Infill of vacant lots in Cheyenne may not be possible where costs of development are so great that they cannot be materialized and recovered in a reasonable length of time, or where costs are to be borne by the city without substantial impact assistance.	The city has proposed infill incentives such as foregoing front-end costs and offering density bonuses to developers. Although infill may not be feasible in all cases, the project has the potential to contribute to infill efforts by creating housing demand which could benefit the community.
1115	The availability and location of water and sewer services should also be considered in determining the capacity of urban areas to absorb growth.	Additional analysis has been conducted to identify the availability of water and sewer services to vacant land in communities. The general topic of utility capacity is addressed in detail in Sections 2.1.7 and 3.1.7 of the FEIS and in relation to residential subdivisions in Appendix B of the Final Jurisdictional EPTR.
1116	The definitions for levels of impact contained within Section 3.1.10.2 of the DEIS are inadequate and should be modified to more accurately characterize how land use will be affected and how the proposed project relates to adopted plans.	It has been assumed that project-related development will comply with applicable local development plans, policies and regulations, and will be located where it is compatible with existing land uses.
1117	The availability of vacant developable land is dependent upon factors not considered within the	Additional analysis has been conducted to identify the number of vacant platted residential

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	DEIS, including whether the land has already been subdivided or properly zoned. In addition the DEIS should consider the lead times necessary to receive development approval and for actual construction.	lots in Laramie County and whether water and sewer service is currently available or would be made available. For further information, please see Appendix B of the Final Jurisdictional EPTR, *Housing and Land Survey*. The FEIS presents mitigations that would help to ensure that local officials and builders would become aware of projected housing needs in a timely manner.
1118	Who would be the party responsible for implementing the temporary project worker facility recommended as a mitigation measure?	Additional analysis of population and housing projections has been done since the DEIS indicating that projected baseline mobile home demand would be able to absorb project-related growth during the decline cycle, thus eliminating the need for a temporary facility. Therefore a temporary facility is not being recommended in the FEIS.
1119	Clarify the definition of "underutilization of developed land."	Underutilization refers to land developed with structural improvements that is not currently in use but which still carries a financial obligation in regard to taxes, user fees, etc.
1120	Definition of vacant land is unclear. Not all platted land is suitable for development due to problems with topography, availability of streets, roads, and public utilities. These factors need to be considered. Concern over the statement that vacant land will stay constant, even though infill in Cheyenne will require vacant land to be utilized.	Additional analysis has been conducted to address utility access to vacant platted land in Laramie County and to determine historical annexation trends. For further information, please see Appendix B of the Final Jurisdictional EPTR. Vacant land amounts will change due to future growth.
1121	Description of baseline acreages should be better documented. Which zones/lot size requirements were used to determine the breakdown of residential needs?	Residential densities are based on a combination of existing land use densities and local planning and development practices rather than on zoning and lot size requirements. The methodology for baseline projections is presented in more detail in Section 3.1.1.1.1 of the Final Land Use EPTR.
1122	Although infill in Cheyenne would be a positive impact, incentives will be needed to entice developers to build in such a manner. Due to the size of tracts of land that need to be infilled and the cost of supplying adequate services to these areas, additional monetary incentives may be	The city has proposed infill incentives such as foregoing front-end costs and offering density bonuses to developers. Although infill may not be feasible in all cases, the project has the potential to contribute to infill efforts by creating housing demand which could benefit the

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	needed.	community.
1123	Acreages in the proposed action section for urban land use need more documentation. Numbers should be backed up.	Land use acreages for the proposed action are based on per capita standards for non-residential uses and on densities for residential uses. These are applied to projected changes in population and housing for the project. Methodology for the proposed action is presented in Section 3.1.1D.4 of the FEIS and in more detail in Section 3.1.1.1.2 of the Final Land Use EPTR.
1124	How will underutilization of single-family housing be absorbed by 1990? If underutilization of mobile home units will last past 1990, is that a long range impact on land use?	Additional analysis and projections of land use and underutilization have been conducted. Underutilization is only indicated if baseline growth would not absorb project-induced vacancies. Long-term impacts occur if underutilization is projected to last beyond 1990.
1125	Concern is expressed about the annexation of vacant land. In general, city boundaries need to reach areas of land for these areas to be desirable for annexation.	The analysis assumes that adopted annexation policies would be enforced by local officials and that recent annexation trends would continue.
1126	Construction of a new interchange at I-80 and Round Top Road would be inconsistent with the Cheyenne Area Development Plan. The area around the I-80/Round Top Road interchange is not planned to be developed until infill of land closer to the city has been developed.	It has been assumed that such growth would not be accommodated with services and infrastructure by the city since this would be in conflict with plans and policies.
1127	The present moratorium on new sewer taps in the South Cheyenne Water and Sewer District will lead to increased development pressure in other areas. If an immediate housing shortage is perceived, there is a chance developments could be approved which do not meet all standards. This situation could cause a large impact on land development in the area.	The analysis assumes that local officials will enforce existing plans, policies, and regulations.
1128	More alternatives should be considered in the land use analysis.	The spatial allocation procedure considers existing neighborhood growth patterns in order to project future locations of growth. The land use analysis assumes that new development will occur in areas where it is compatible with existing uses. Information on the spatial

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		allocation methodology has been added and is contained in Appendix B of the Final Land Use EPTR.
1129	On what basis was the project-related demand for 76 acres of mobile home development figured?	Mobile home development was figured on the basis of 760 mobile homes at a density of 10 units per acre. This finding has been revised in the FEIS and support documents. For further information, please see Section 3.1.10.4.2.1 of the FEIS.
1130	What is meant by the recommendation for implementation of local ... policies? The subcommittee believes the positions of decisionmakers with regard to local policies should be strengthened.	The mitigation measure is meant to indicate a strengthening of positions by decisionmakers in Cheyenne and Laramie County consistent with the land use subcommittee's recommendation.
1131	The Wyoming Department of Agriculture supports mitigation measures outlined for lessening impacts on rural land use.	Noted.
1132	There are long and short term unavoidable adverse impacts on rural land.	Subsequent to the DEIS, new analyses were conducted which identified unavoidable adverse impacts. These impacts result from identification posts installed after cable placement which may interfere with farming practices in affected fields. There may also be some limitations to construction of future agricultural improvements along certain cable easements. This issue is discussed in Section 3.1.10.7 of the FEIS.
1133	The rural land use analysis was based primarily on satellite photographs. Does this method adequately identify temporary or sporadic uses (recreational hunting, fishing, etc.) and the Peacekeeper impact on this type of use?	Satellite photography was used to analyze the relative percentages of land uses and land cover found in the Region of Influence for the existing conditions analysis. Remote sensing interpretation of such large areas is not meant to apply to such temporary and localized uses as recreational activity. For further information please see Section 2.6.2.1 of the Final Land Use EPTR.
1134	Some of the Land Use subcommittee members would like to review a plan of all roads to be upgraded.	Noted.
1135	Clarification of the term "standard assumed Air Force mitigations" needs to be made in reference to urban land use.	There were no assumed mitigations for urban land use in the DEIS. An assumed mitigation in the FEIS calls for cooperative community planning by project representives, government agencies and

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		community groups.
1136	After cables are installed, what kinds of maintenance will occur on the site and what are the security measures? Land use that involves destruction is significant, especially during crucial times of the year.	Security measures and minimal maintenance procedures for the new buried cable system will be virtually identical to those now in force for the Minuteman system. Although an interruption of certain land uses will occur, impacts will be localized and temporary in nature. Mitigation measures have been offered, including reference to harvest seasons. For further information, please see Section 3.1.10.6.2 of the FEIS and Section 3.7.2.1 of the Final Land Use EPTR.
1137	Impacts to agriculture from traffic, dust, noise, general disruption to livestock, farming, and agricultrual operations, especially during harvest season, need specific mitigation measures covered in the EIS.	Efforts will be made whenever possible to minimize impacts to harvests, livestock, farming, and agriculture in general. Mitigation measures have been expanded to address the listed issues of concern. For further information, please see Section 3.1.10.6.2 of the FEIS and Section 3.7.1.2 of the Final Land Use EPTR.
1138	Cable emplacement should be scheduled to avoid impacts during times of critical agricultural activity to avoid interference with current farming and irrigation operations.	Timing of cable laying will be determined by a combination of operational requirements, weather, minimizing impacts to ongoing agricultural activities and soil conditions. For further information, please see Section 3.1.10.6.2 of the FEIS and Section 3.2.2.1.2 of the Final Land Use EPTR.
1139	What are the reclamation plans and final basic methodology for reclaiming lands disturbed by trenching. The EIS should address this. Also land settling has been known to occur in the past from trench excavation. Will this occur in this case? When the cable is emplaced, will a surface depression be left along the length of the trench?	Detailed reclamation plans were not outlined in the DEIS because the level of detail required for these is not within the purview of an EIS analysis. Specific soils engineering measures to minimize settling along cable routes will be employed. For further information, please see Section 3.1.10.6.2 of the FEIS.
1140	How long will land underlying the easement be out of production? Will landowners be compensated? Will routine maintenance affect land in production? If so, during what times of year? Will landowners be compensated accordingly and how will compensation be determined?	Analysis suggests that land on communications cables easements will be out of production for no more than one season and may, in fact, not be out of production at all. Any loss of crop production will be compensated. The basis for compensation has yet to be determined. Routine maintenance will not affect land in production. All cable

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		construction will be planned to minimize as much as practicable disturbance to agricultural lands. Please see Section 3.2.2.1.2 of the Final Land Use EPTR for further discussion of mitigations either from surface disturbance during construction or during maintenance.
1141	The figures used to value acres of irrigated cropland, dry cropland, and rangeland are inaccurate fair market values in Nebraska.	The valuation figures are assessed values not fair market values. The assessed valuations were used to rank the cables by applying a value factor to the three land uses and hence determine an order of value, namely, that dry cropland is over twice as valuable per acre as rangeland and irrigated cropland is nearly three times as valuable per acre as dry cropland. These proportions are nearly identical to the values found in the three Nebraska counties; therefore the analysis does not change.
1142	Potential impacts to farm and ranch operators should be addressed; the Air Force and its contractors should cooperate fully with them. Launch facility and road modifications may have indirect impacts on rural land use.	Additional mitigation measures have been offered, including coordination of subcontractor activities with the commencement of construction activities. Also the discussion of potential impacts to farm and ranch operators has been expanded subsequent to the DEIS. For further information, please see Section 3.1.10.4 of the FEIS and Section 3.2.2.1.2 of the Final Land Use EPTR.
1143	The Wildlife Federation believes that the Wyoming Industrial Siting Council should provide whatever data possible to the Air Force so that mitigation and impact assistance to ranchers and farmers is swiftly implemented.	Noted.
1144	Construction of additional cable lines may result in installation hazards. When cables were installed previously, cows were injured from falling in open trenches. This problem should be addressed.	A mitigation measure which suggests restricting access to open cable trenches by covering them or providing trench barriers has been offered. For further information, please see Section 3.1.10.6.2 of the FEIS.
1145	Can agricultural improvements, such as additional pipelines, be buried through cable paths?	There will be some limitations to surface disturbance and agricultural improvement activities on land overlying the cable system. In most cases agricultural improvements will not be prohibited but specific design and construction

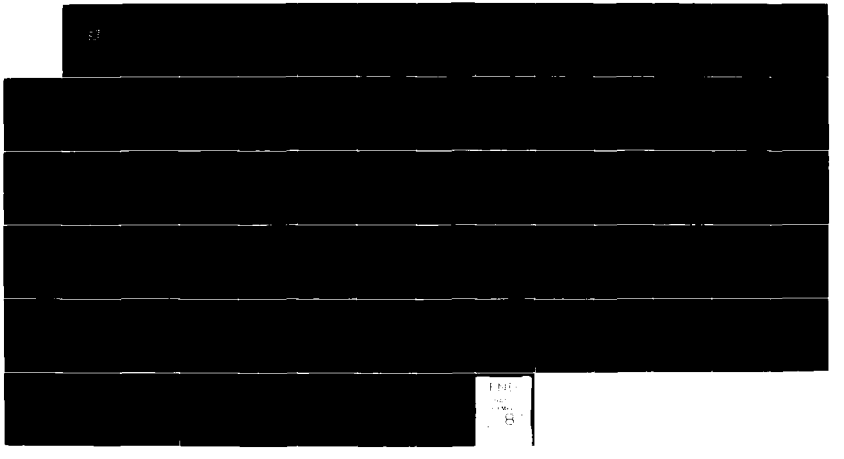
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		measures may be required. For further information, please see Section 3.1.10.7 of the FEIS.
1146	More attention should be paid to the potential impacts of project-related growth on rural subdivisions.	Inmigrant workers and families are allocated to communities rather than rural areas with low population density. Inmigrants are temporary residents who would generally utilize existing facilities.
1147	The assumption that 40 percent of new housing would go northeast of the city of Cheyenne [illegible] quarter-acre lots is unreasonable.	All allocations of housing, both baseline and project-related, have been reevaluated in order to accommodate information generated by the recent *Housing and Vacant Land Survey*. The 40-percent assumption is no longer used. The placement of housing is evaluated according to growth patterns at the neighborhood level. For further information, please see Appendix B of the Final *Land Use EPTR*.
1148	Wyoming's subdivision [illegible] requires [illegible] Conservation District to review proposed subdivisions in their district as regard to potential soil erosion, flooding and septic system problems. A significant increase in subdivision reviews can be anticipated based on the numbers of new immigrants into the region that the Draft Land Use EPTR anticipates.	The Laramie County Soil Conservation District, as an example, currently averages seven subdivision reviews per month. Plans are checked against soil surveys, published maps, and aerial photos, and a brief fieldcheck is done. The process averages 2-3 hours if the subdivision is in or around Cheyenne. Project-related inmigrants will not all arrive at once; there will be population influx over a period of years. Many families will move into existing approved subdivisions with vacant lots, others will move into existing housing units vacated by others. It is not anticipated that the subdivision review process will be onerous for the Soil Conservation District.
1149	The study does not adequately assess the [illegible] needs in the areas of [illegible] There is no discussion of the demand and process and impacts on the planning office.	Additional staffing for both city and county zoning offices is included in baseline and impact considerations under the general government staffing discussion. The general planning process is discussed within Appendix A of the Final Land Use EIS.
1150	For all [illegible] methods of [illegible] engineering [illegible]	The expansion of staff activity can be accomplished in several ways including part-time staff, full-time staff, and overtime. Such

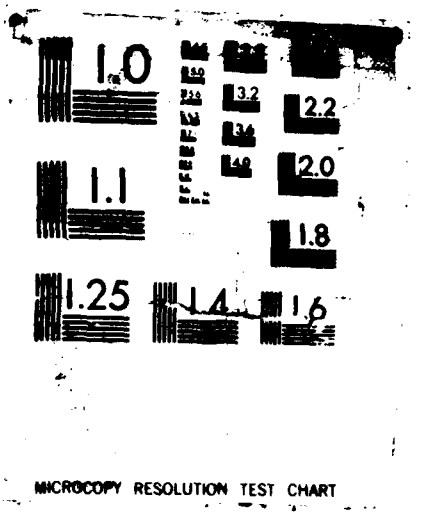
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	mitigation metrics
1151	The possibility of the City, [illegible] portions of the South [illegible] District is unlikely [illegible]

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UNCLASSIFIED F/G 16/1 NL




1.0
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MICROCOPY RESOLUTION TEST CHART

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1152	Wyoming Industrial Siting Administration suggests additional mitigations of avoiding distrubance of wet or muddy lands, notification of landowners prior to entry, debris removal from sites and reseeding of distrubed areas with native plant species.	The analysis has been expanded and now includes many of these concerns, specifically the recommendation of environmental awareness training which address landowner concerns. For further information, please see Section 3.1.10.6.2 of the FEIS, Section 10.4 of the Final Jurisdictional EPTR and Section 3.2.2.1.2 of the Final Land Use EPTR.
1153	Comments on city standards for parklands and mitigation measures will be forwarded at a later time.	Noted.
1154	Given the ramifications to wildlife management, documentation should be provided within Section 3.1.11 regarding the estimated impacts on wildlife associated recreation. Sloans Lake and Lake Absaraka (Country Club Lake) presently receive substantial fishing pressure, which could increase as a result of impacts from the proposed project. Water quality and fish habitat improvement should be examined as potential mitigating measures at Sloans Lake. Development of additional fisheries should also he considered as a mitigating measure.	Based on fishing use data provided by the Wyoming Game and Fish Department, current use at Sloans Lake and Lake Absaraka in less than 600 activity days. Because these figures are relatively low in comparison to many other regional areas, the increased pressure allocated by the gravity model is also low. There does not appear to be a need to implement such measures based on the project impact alone. Impacts on wildlife resources are discussed in Section 3.2.2.4.2 of the FEIS and Section 3.5.2 of the Final Biological Resources EPTR.
1155	Adoption of the environmental awareness program recommended as a mitigation measure is urged.	The environmental awareness program is offered as a mitigation measure. For further information, please see Section 3.1.11.4 of the FEIS and Section 10.4 of the Final Jurisdictional EPTR.
1156	The DEIS does not inform the reader of patterns of public use or budget and staffing requirements within Medicine Bow National Forest. No attempt is made, for example, to describe problems, facilities and visitor use in the Pole Mountain/Vedauwoo area, which is one of the areas most heavily used by Cheyenne residents.	Additional analysis has been conducted on visitation and use, budget, staffing, and law enforcement. For further information, please see Section 10.1.1.1 of the Final Jursidictional EPTR.
1157	The second line of the summary matrix is confusing. Local impacts are shown on regional recreation.	Local impacts were shown because of the primarily local attraction of Sloans Lake and Lake Absaraka. Local impacts under regional recreation have been eliminated from the matrix in the FEIS and Final Land Use EPTR.

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1158	Demand for recreation may result in conflicts between agricultural landowners and recreation seekers related to trespass, loss of wildlife and other problems related to access to private land.	Game and fish violations are addressed in Section 10.3 of the Final Jurisdictional EPTR and trespass violations are exhibited in Tables 10.3.1-1 and 10.3.1-2 of that document. The latter information reflects few trespassing complaints relative to other kinds of violations and it is likely that violations attributable to the inmigrant population will be roughly proportional to those shown in the table. By applying trespass violations in Fish and Game Law Enforcement Districts 3 and 5 as a percentage of all hunting and fishing violations to projections of statewide violations for peak year 1987, only three additional trespass violations would occur statewide. A mitigation measure has been offered, and is discussed in Section 3.1.11.4 of the FEIS and detailed in Section 10.4 of the Final Jurisdictional EPTR that would require project employees to attend environmental awareness training designed to prevent the conflicts described in the comment.
1159	The definition of recreational use employed in the DEIS was arbitrary and too narrow.	The definition of recreational use was developed such that analysis could be performed in a rational and appropriate manner. The activities used to represent recreational use were selected because they were considered to have the most potential for impact.
1160	Lake McConaughy was identified as having the highest percentage of out-of-state users. It should, therefore, have been included in the Region of Influence and the impact evaluated accordingly.	Lake McConaughy was included in the Region of Influence. Its increases in activity days and percentage increases are insignificant in relation to baseline use figures. For further information, please see Appendix D of the Final Land Use EPTR.
1161	The impact on local communities and their ability to respond to day-to-day recreational needs of project-induced population needs to be more fully developed.	The analysis is based on available data and the best professional judgment of planners and recreation officials in the area. Communities are considered individually and collectively in terms of their existing recreational assets and the surplus or deficit of those assets are measured against the projected impact of the inmigrant population. For further information, please see Section 3.5.2.2 of the Final Land Use EPTR.
1162	Section 2.1.11.2.2.2 of the DEIS includes the public library as a provider of recreational	In certain communities (namely, rural communities with small populations) libraries provide

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	programming and/or facilities. The library should be included in the definition of local recreation provided in Section 2.1.11.2.2.	recreational programming or activities. Where they do, an attempt has been made to include this information. Libraries are not excluded from the local recreation defiinition; they are considered developed facilities, and are generally located in urbanized areas.
1163	The DEIS assumes that existing levels of activity will continue under the "No Action" scenario. What is the basis of this assumption?	For purposes of this analysis, projections of visitation levels at all recreation areas within the Region of Influence were not necessary since the projections would only be used as attractiveness factor inputs to the gravity model. The same result can be achieved by using existing visitation values to represent baseline since the same relative relationship would exist between various areas.
1164	The data unit inconsistencies (activity days vs visitor days) are not defined.	The data inconsistencies problem is addressed in detail in Appendix C of the Final Land Use EPTR. The existing units of data available for each type of recreational area are identified in Section 2.6.2.1 of the Final Land Use EPTR.
1165	The DEIS indicates the project-related increase in recreational activity will have a low and not significant impact on the quality of the recreational experience in the long term. Does this statement apply to peak times of the year?	Impacts are considered to be low and not significant during the long term only. The increased use is low enough that, assuming some distribution over the peak season, the increase during peak periods is also expected to be low and not significant.
1166	Percentages usually are used to report data in the DEIS, but activity days are sometimes used without defining the term or relating it to the more often used percentage.	The definition of "activity days" has been added to the glossary in the FEIS. It is also defined in Section 3.1.11.4 of the FEIS. Percentages are used to demonstrate the relative magnitude of impacts.
1167	The Kimball area appears not to have been adequately studied in Section 3.1.11.4.2.2 of the DEIS even though impact is assessed for the area. Further study should be conducted.	The DEIS includes sufficient background data to draw conclusions concerning impacts on local recreation systems, including Kimball. However, more specific information for Kimball exists in Section 2.6.2.2.3 of the Final Land Use EPTR.
1168	The DEIS states that because staging areas (dispatch stations), roads, and cable system routes do not affect parkland or recreational	No access routes to designated public recreational areas will be disrupted. Some hunting, fishing, and other activities occurring

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	facilities, no impact is anticipated. This is not true of recreational activities that take place in areas other than designated parks or recreational areas, and, it does not give effect to descriptions of routes to designated parks and recreational facilities.	on private lands may be relocated or otherwise disrupted by construction of dispatch stations, roads, and cable system routes. Disruption, however, is anticipated to be generally minimal since facilities are proposed to be located in or adjacent to urban areas.
1169	Were local data for Kimball (and other areas) cited in Section 3.1.11.4.2 of the DEIS actually available?	Specific information for Cheyenne, Kimball, Pine Bluffs, Wheatland and Chugwater is provided in Sections 2.6.2.2 and 3.5.2.2 of the Final Land Use EPTR.
1170	A large inmigrant construction work force displays different characteristics from the existing population and will most likely disrupt normal recreation, hunting and fishing activities throughout the region. Neither specific impacts nor possible mitigation efforts have been satisfactorily addressed in the DEIS.	The unique characteristics of the inmigrant population have been taken into account giving effect to the age and socioeconomic characteristics of the inmigrant group. Disruptions are estimated to be minor. The methodology is discussed in Appendix C of the Final Land Use EPTR. Impacts are discussed in Section 3.5.2.1.2 while potential mitigation measures are identified in Section 3.7.2.1 of the same document.
1171	The environmental consequences, mitigation measures, and unavoidable impacts in Section 3.1.11 are understated and insufficient.	Mitigation measures addressing major issues have been expanded in the FEIS. With mitigation, it is not considered that there will be any unavoidable impacts. Details of environmental consequences are provided in Section 3.5.2.1.2 of the Final Land Use EPTR.
1172	The Proposed Action in Section 3.1.11.4.1.2 is inadequate and does not address the problem of already overloaded resources.	Every effort was made to consider the capacity problems that exist at many of the recreational areas withiin the region. Expanded mitigation measures have been added to Section 3.1.11.6.1 of the FEIS that address problems of increased use.
1173	No mention is made of wildlife-related recreation in "The Affected Environment" section of the DEIS. Data on hunting, fishing and nonconsumptive use of wildlife should be included.	The Wyoming Recreation Commission and the Wyoming Game and Fish Department do not maintain records of noncomsumptive use, but assess the impact as negligible. The U.S. Forest Service reports that at Medicine Bow National Forest nonconsumptive wildlife users accounted for 3.74 percent of all wildlife-based activities in 1981, and created negligible impact. Hunting and fishing use figures for regional recreation areas are provided in

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		Section 10.1 of the Final Jurisdictional EPTR and Section 2.6.2.1 of the Final Land Use EPTR.
1174	The DEIS does not adequately describe problems, facilities, and visitor use in Medicine Bow National Forest. Information on user patterns, expenditures and staffing should be included.	Specific information about Medicine Bow National Forest is included in Section 10.1.1 of the Final Jurisdictional EPTR.
1175	The DEIS does not distinguish among various units within Medicine Bow National Forest for differing rates of use at different times of the year. What units are subject to full capacity use at what times of the year?	The U.S. Forest Service data do not identify use patterns within Medicine Bow or any of the national forests by specific time of year. Therefore, such specific analysis could not be performed.
1176	All state parks in Wyoming are experiencing problems with law enforcement. Wyoming Recreation Commission estimates that 20 percent of visitation to Curt Gowdy is by residents of Cheyenne and Laramie County and that basing the Peacekeeper in southeast Wyoming will exacerbate the law enforcement problem in the parks. This is a particularly severe problem because Wyoming Recreation Commission depends on the Laramie County Sheriff's Department assistance and the arrangement could change based on the severity of the impact and staffing for the Sheriff's Department.	Additional law enforcement patrols are suggested for Curt Gowdy State Park and Medicine Bow National Forest (Pole Mountain Unit). Mitigation measures pertaining to law enforcement at Curt Gowdy State Park are now provided in Section 3.1.11.6.1 of the FEIS.
1177	The Area of Concentrated Study regarding regional recreation impact includes Wyoming counties only. The 150-mile radius of the Region of Influence is arbitrary and fails to consider the impact on cities other than Cheyenne even though project-related inmigrants will live in other cities as well.	The Area of Concentrated Study was determined to contain the resource-based areas that would be most seriously affected by project-induced population. The Region of Influence radius of 150 miles is the maximum distance participants are likely to drive for a single day's recreation. This is a professional judgment supported by knowledgeable federal and state planners. The Region of Influence thus is the principal source of participants for recreational facilities in the Area of Concentrated Study. In the revised recreation analysis, Wheatland and Torrington were included as population nodes because, together with Cheyenne, they would contain the largest absolute numbers of inmigrants during peak year.
1178	Regional recreational facility and personnel needs resulting from project-related demands are not	Mitigation measures have been expanded in the FEIS to incorporate all these concerns. For

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	adequately addressed in the DEIS. Expansion of Curt Gowdy and provisions to accomplish law enforcement should be considered. Those mitigation measures identified do not adequately answer the needs described. The FEIS should address more fully regional recreation needs and indicate appropriate mitigation measures based on such needs.	further information, please see Section 3.1.11.6.1 of the FEIS.
1179	Although the DEIS shows regional impacts on Colorado recreational facilities that would result from the project, the document lacks data to assess the impact.	Information obtained from state and federal recreation agencies indicates that, in general, Wyoming residents do not seek outdoor recreation in Colorado. A gravity allocation model, the details of which are explained in Appendix C of the Final Land Use EPTR, has allocated some project-induced recreation pressure to Colorado. The greatest absolute pressure is allocated to Roosevelt National Forest (12,333 activity days). Other affected areas include White River National Forest (4,936 activity days) and Pike National Forest (4,144 activity days). In no case was any Colorado recreation facility allocated an impact of more than 0.6 percent in the peak year (1987).
1180	Oliver Reservoir has been built and maintained largely with donated funds and volunteer labor. It is an attractive area that will soon attract increased use, and it will no longer be supportable by private donations of funds and volunteer labor. Some assistance will be required to maintain the area properly.	According to the gravity model allocation performed as part of this analysis, Oliver Reservoir will receive only a small increase in visitation attributable to the project. During peak year, an increase of only 381 total activity days is forecast, so the impact will be insignificant.
1181	Park maintenance costs in Cheyenne are $1,900 per acre/year. Without extensive volunteer efforts for parkways and athletic complexes, this cost would rise by approximately 25 percent.	This information has been included in the existing conditions section and is used to project increased maintenance associated with the project. For further information, please see Section 2.6.2.2.1.4 of the Land Use EPTR.
1182	The City of Cheyenne Parks and Recreation Department has less than 3,000 square feet of inside storage space. It is estimated that 36,000 square feet is required to meet the Department's needs; added demand on maintenance created by project impact exacerbates this condition.	A discussion of indoor storage space is included in Section 2.6.2.2.1.4 of the Final Land Use EPTR, including a description of available storage space and storage needs per division.
1183	The DEIS reports a goal of five acres of parkland per 1,000 individuals residing in neighborhoods.	This information has been incorporated and has been used to project parkland for the city as a

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	The standards officially adopted by the city are as follows: six acres per 1,000 people in greater Cheyenne, such that approximately half shall be neighborhood parks and half shall be community parks. Deficient neighborhoods shall be provided with five acres per 1,000 people wherever possible.	whole and the specific neighborhoods expected to receive a large portion of the project-related population. For further information, please see Section 3.1.11.4.2 of the FEIS and Section 2.6.2.2.1.2 of the Final Land Use EPTR.
1184	The DEIS does not assess impact for both greater Cheyenne and for neighborhoods. The analysis should be conducted on both levels in order to pinpoint the areas most significantly affected.	Since publication of the DEIS, a parkland analysis of the Cheyenne urban area has been conducted. It includes a neighborhood analysis which can be used to pinpoint those areas which might be affected by the project. For further information, please see Section 3.1.11.4.2 of the FEIS and Section 3.5.2.1.1 and Appendix E of the Final Land Use EPTR.
1185	South Cheyenne faces substantial growth with inadequate bicycle and pedestrian facilities, little public open space and no mechanism to provide and maintain these facilities. The DEIS observes that South Cheyenne is 30.2 acres deficient in developed parkland, but little discussion is devoted to the significance of this fact.	The analysis in Appendix E of the Final Land Use EPTR discusses the acreage surpluses and deficiencies of each neighborhood. This section discusses the "significance" of specific parkland deficiencies with relationship to the City's ability or inability to bring such neighborhoods up to standard.
1186	Proposed mitigation measures in the DEIS are not adequate. Mitigation strategies must be more specific and better defined. They should include considerations of how to develop and maintain recreational facilities and should make provisions for funding development and maintenance.	Mitigation measures have been expanded to include specific recommendations for those neighborhoods receiving the largest numbers of inmigrants. A discussion of maintenance, timing, and effectiveness has also been included. Under the Memorandum of Agreement among the Secretary of Defense and the governors of the states of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
1187	The U.S. Forest Service is an agency that manages land within the National Forest System. It would be more appropriate to refer to National Forest System Lands. Reference is made to page 2-44 in Section 2.6.2.1.2; page 3-8 and page 3-6 in the	References to U.S. Forest Service Lands have been changed to National Forest System lands.

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	Draft Jurisdictional EPTR; and page 246, paragraph 1 in the DEIS.	
1188	The term "educational transportation" is not defined.	The term "educational transportation" should read "educational interpretation."
1189	Downhill skiing visitor days appear to be underestimated. Necessary data should be obtained from ski operators rather than U.S. Forest Service reports.	The U.S. Forest Service skiing data were tabulated from the operators of ski areas within the various national forests.
1190	The method used to determine the residence of visitors at Medicine Bow National Forest is neither valid nor accurate.	The method used to identify visitor origins (i.e., general sampling of license plates) was only used to help establish background on visitation characteristics at the Forest. Due to the lack of complete and detailed origin data available from the Forest Service, this method was satisfactory for the purposes of the study.
1191	The assumption that as user pressure increases at Medicine Bow National Forest users will redistribute themselves to less-used sites is invalid. It assumes all sites to be equally attractive.	According to U.S. Forest Service statistics, there are many more sites below theoretical capacity than there are at or above capacity. Therefore, it would appear that there are many opportunities to find less utilized areas within the Forest.
1192	Impacts on different facilities will affect them differently. Each facility must be studied in terms of the capacities. For example, because of differences in size, an increase of 20 activity days in boating at Curt Gowdy State Park may have more impact than an increase of 200 days of boating at the larger Glendo State Park.	An attempt was made to incorporate capacities information for recreational areas wherever possible. For further information, please see Section 10.1.1.3.1.1 of the Final Jurisdictional EPTR and Section 2.6.2.1.5.1 of the Final Land Use EPTR.
1193	A one-time sampling of state park use during a major holiday does not support a valid estimate of park use. Additional data should be provided.	The one-time field sampling at Wyoming state parks was performed only as a supplementary source of visitation data. The basic sources used were data and reports provided by the Wyoming Recreation Commission.
1194	Conflict is not an "over capacity condition." Conflict is caused by goal interference caused by the behavior of the user and may occur irrespective of overcrowding.	This observation is incorporated in Section 3.1.11.3.1 of the FEIS.
1195	In Section 2.6.2.1.8 on page 2-62 of the Draft EPTR, "Gray Reefs" should be "Gray Rocks."	The Gray Reefs Reservoir discussed in Section 2.6.2.1.8 of the Draft Land Use EPTR is located

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1196	Estimates of recreation use at Upper North Crow Reservoir are based on a sample size of one. Conclusions based on this sample are invalid and inaccurate.	in Natrona County. Greyrocks Reservoir, under the jurisdiction of the Wyoming Game and Fish Department, is located in Platte County. In the absence of any recorded visitation data for activities other than fishing, field investigation was used to obtain a general indication of the amount of use at the area. Although the actual numbers used in the model may not be entirely accurate for Upper North Crow Reservoir, they give a relative indication of use in comparison to other areas within the Region of Influence. The fact remains that visitation is generally low due to poor access and signing.
1197	The 75 acres of developed ballfields should not have been included in estimating parkland deficiencies. These facilities are used by a very narrow age range and are not available to the public in all instances.	Athletic fields are often scheduled for use by leagues. The recreation fields should be included in the parkland analysis since they contain facilities which are usually included in a neighborhood park. The National Recreation and Parks Association defines a neighborhood park as an "Area for intense recreation activities, such as field games, court games, crafts, playground apparatus, skating, picnicking, wading pools, etc." For further information, please see Section 2.6.2.2.1.2 of the Final Land Use EPTR.
1198	Suggesting that because visitation fluctuates from year to year baseline use projections are not necessary is incorrect. Visitation level projections should be made for 1987 and 1990.	For purposes of this analysis, projections of visitation levels at all recreation areas within the Region of Influence were not necessary since the projections would only be used as attractiveness factor inputs to the gravity model. The same result can be achieved by using existing visitation values to represent baseline since the same relative relationship would exist between the various areas.
1199	Past experience in Wyoming suggests that the inmigrant population will not exhibit the same sociodemographic characteristics as current residents of Cheyenne. This is a false assumption on which projected use of facilities is based, and it should be changed.	The age structure of the inmigrant population has been incorporated into the development of per capita participation rates. This revised methodology reflects the relatively young age of the inmigrants. Eight of the ten activities included in the study exhibit higher participation rates when age is considered. For further information, please see Appendix C of the Final

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		Land Use EPTR.
1200	Areas outside the Area of Concentrated Study should not be included in the gravity model. To do so lowers the attractiveness of sites within the Area of Concentrated Study and therefore lowers the impact assessment derived from the model.	All areas within the 150-mile Region of Influence radius are included in the model in order to realistically capture all potential recreational movements of population inmigrants. The Area of Concentrated Study represents the area within the Region of Influence where the majority of these movements would occur. Exclusion of areas outside the Area of Concentrated Study from the model would unrealistically overestimate visitation areas within the Area of Concentrated Study.
1201	Impact assessment should include issues in addition to the estimate of increased activity days. These should include such things as law enforcement, squatters on state and federal lands and other management problems. These are not addressed in the Draft Land Use EPTR.	Law enforcement concerns and potential problems associated with transient populations have been studied. Analysis suggests that transient problems will exist to some extent and mitigations have been proposed. For further information, please see Section 3.5.2.1.2 of the Final Land Use EPTR and Section 3.7.6 of the Final Public Services and Facilities EPTR.
1202	The U.S. Forest Service and Wyoming Recreation Commission are the two regional recreation agencies most affected by this project. It would be appropriate to assess impacts in visitor days, which are the measures of visitation used by these agencies.	Although it was recognized from the outset that Medicine Bow National Forest and Curt Gowdy State Park would likely receive the greatest increase in visitation as a result of population inmigration, it was necessary to treat all recreational areas in an equal manner since other agencies also have concerns. The increase in demand for all recreational areas was calculated in terms of activity days because per capita participation rates derived from the Wyoming State Comprehensive Outdoor Recreation Plan and the Water Resources Research Institute report were only available in activity (participation) days.
1203	The gravity model needs more explanation and documentation. There is a question as to whether there is an attractiveness factor for all sites. The number of alternative sites is not included in the model. There are no existing data that would allow for the determination of participation days at each recreation area from a population center.	All major regional recreation areas that are likely to attract visitation from Cheyenne and other impact population areas are included in the model. The gravity model allocates activity (participation) days to each recreation area on the basis of relative attractiveness and friction factors from a given population center. Partici-

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	The model should not use statewide data and infer from them the characteristics of Cheyenne.	pation rate data for Cheyenne alone do not exist, so statewide age-weighted rates reflecting the inmigrant population were used, which is a better indicator. The gravity model methodology is described in detail in Appendix C of the Final Land Use EPTR.
1204	The basis for concluding that no new staffing is required is unclear and the conclusions seem to have no basis in fact. Most regional recreation areas are understaffed.	In the absence of standards for staff-to-visitation ratios or other staffing standards, the use of existing staff-to-visitation ratios was deemed a reasonable approach. The methodology for determining staffing need is discussed in Appendix A of the Final Jurisdictional EPTR.
1205	Laramie, Scottsbluff, Torrington, and Wheatland should have been included in the Area of Concentrated Study for local recreation impact.	An analysis of all municipalities within the Region of Influence was conducted and used to determine the Area of Concentrated Study. Laramie, Scottsbluff, and Torrington will not receive sufficient population (all increases less than 5 percent) to be included in the Area of Concentrated Study. However, an analysis of those towns is contained in the Final Jurisdictional EPTR. Wheatland is included in Section 3.1.11 of the FEIS.
1206	The State Comprehensive Outdoor Recreation Plan (SCORP) data used as a basis for determining baseline projected participation rates are five or six years old. Accurate data should be provided. There should be documentation for verbal estimates of recreation planners.	In the final analysis, participation rate data were derived from a Water Resources Research Institute report (Carlson and Phillips 1980) rather than the SCORP in order to take age groups into consideration. This is the best available source for providing age-related rates. Verbal estimates were only used when no other data sources were available.
1207	National Recreation and Parks Association open space guidelines were developed generally with large metropolitan areas in mind. They should be used cautiously in rural areas if qualified to fit the region. The general application of standards to community level recreation needs must be qualified to consider social priorities and population densities.	Where a municipality had adopted standards, those standards were utilized. In the absence of adopted standards, the state and national standards were utilized, only after considering the social and demographic properties of each locality.
1208	The Draft Land Use EPTR states that Wyoming residents do not generally travel to Colorado and	The text has been amended to reflect the comment.

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	Nebraska for recreational activities. It should be revised to specify outdoor recreation.	
1209	Both employed immigrants and transients may choose to camp at Curt Gowdy State Park while awaiting housing and/or a job. Appendix B of the Draft EPTR does not mention this kind of use and Wyoming Recreation Commission considers the analysis incomplete and inadequate for this reason.	Appendix B in the Draft Land Use EPTR and Appendix C in the Final Land Use EPTR discuss the methodology used in estimating induced recreational participation and visitation. A discussion of the potential for long-term camping by transients is discussed in Section 3.5.2.1.2.4 of the Final Land Use EPTR. Mitigation measures addressing the problem are included in Section 3.1.11.6.1 of the FEIS.
1210	Mitigation measures do not address the level of impact described in the Land Use Draft EPTR. They do not deal with the problem of public safety, which is Wyoming Recreation Commission's greatest concern. The measure that calls for development of management techniques to control park overcrowding is nebulous and impossible to carry out without resources of additional manpower or park facilities.	The mitigation measures related to quality of the recreational experience and public safety have been expanded and are included in Section 3.1.11.6.1 of the FEIS.
1211	The Black Mountain Recreation Center is located west of Lewis Park and is 12,900 sq ft in size, has no outdoor swimming pool, and no 9 hole golf course. There are two outdoor tennis courts and a small indoor pool (17'x50'). Please incorporate this information into the Final Jurisdictional EPTR.	This information has been included and can be found in Section 4.2.9 of the Final Jurisdictional EPTR and Section 2.6.2.2 of the Final Land Use EPTR.
1212	South Cheyenne and northeast portion reference is extremely misleading. Define boundary and include a better description of existing conditions.	Clear definitions of existing conditions for all neighborhoods in the Cheyenne Urban Area are provided in Appendix C of the Final Jurisdictional EPTR and Appendix E of the Final Land Use EPTR.
1213	Population estimates used to derive local service standards in Table 3.2.9-10 of the Draft Jurisdictional EPTR do not correlate with other estimates in the report.	The population estimates have been revised. For further information, please see Section 3.2.9 of the Final Jurisdictional EPTR.
1214	It is the misquoted local standard and the inclusion of athletic fields as parkland which enables the Draft Jurisdictional EPTR to conclude that the City has sufficient parkland to	A neighborhood analysis has been completed using the new standard. It provides more specific information concerning area deficiencies, but athletic fields are still included in the citywide

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	meet its own standard.	analysis. For further information, please see Section 3.2.9.3 of the Final Jurisdictional EPTR.
1215	Project impacts are estimated based upon existing service levels. This approach is unacceptable since project-related population will have different demographic characteristics than the current population. The recreational needs of each group should be analyzed separately to accurately define recreational needs. Weekly commuters also need to be included within the analysis.	Project impacts for parkland and facilities are not projected on the basis of existing service levels; they are based upon national, state, and adopted local standards, often in excess of existing service levels. Staffing impacts are based on existing staffing levels since it appears that the level of staffing is quite adequate given current fiscal constraints. The varying participation rates of inmigrants are now addressed through an age/class factor and weekly commuters are included. For further information, please see Section 3.1.11.4.2 of the FEIS, Section 3.2.9.3 of the Final Jurisdictional EPTR and Section 3.5.2.2 of the Final Land Use EPTR.
1216	Options shown for additional resources should reflect short and long-term approaches. The use of F.E. Warren AFB recreational facilities by the general public should be included as an option.	The mitigation section for local recreation does discuss short and long-term options. F.E. Warren AFB facilities are only for use by Department of Defense civilian and military personnel. For further information, please see Section 3.2.9.4 of the Final Jurisdictional EPTR.
1217	The mitigations section basically suggests that fees be increased and that taxes be raised through the creation of a recreational district in order to meet the large recreational demand indicated in the impact section. It also suggests the use of volunteers rather than hiring paid staff. All of these options are of course possible but the cost of the impact should be borne by those causing it, not by the current city taxpayers or volunteers.	Additional mitigation measures are provided, including mitigation measures which respond to specific area concerns. Under the Memorandum of Agreement among the Secretary of Defense and the governors of the states of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operations of the Peacekeeper system. For further information, please see Section 3.1.11.6.2 of the FEIS and Section 3.2.9.4 of the Final Jurisdictional EPTR.
1218	In the analysis of existing parkland, the Draft Jurisdictional EPTR includes leased acres of parkland which are being used for athletic facilities. These facilities are leased to specific leagues and are not normally available to the general public. The Greater Cheyenne Parks and	Athletic fields are often scheduled for use by leagues. The recreation fields should be included in the parkland analysis since they contain facilities which are usually included in a neighborhood park. The National Recreation and Parks Association defines a neighborhood park

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	Recreation Facility Master Plan does not define these facilities as parkland because of this.	as an "Area for intense recreation activities, such as field games, court games, crafts, playground apparatus, skating, picnicking, wading pools, etc."
1219	The impacts on School District facilities from public recreational use are not addressed.	A discussion of these impacts is included. For further information, please see Section 3.2.9.3 of the Final Jurisdictional EPTR.
1220	The Greater Cheyenne Recreation Commission has adopted a policy that there should be 5 acres of parkland within each neighborhood for each 1,000 persons. The Draft Jurisdictional EPTR misquotes this by stating that the standard is 5 acres for each 1,000 persons citywide.	A neighborhood analysis which describes the available parkland in each neighborhood has been completed. A newly proposed standard has been applied to each neighborhood to determine the need for additional parkland. For further information, please refer to Section 2.1.11.2 of the FEIS and Section 3.2.9.1 of the Final Jurisdictional EPTR.
1221	The Cheyenne Parks and Recreation Department would like the standard of 5 acres of neighborhood parkland per 1,000 population changed to 6 acres.	A neighborhood analysis which describes the available parkland in each neighborhood has been prepared. For the "citywide" analysis a standard of 6 acres of parkland per 1,000 people has been applied to determine the need for additional parkland. For further information, please see Appendix C and Section 3.2.9.1 of the Final Jurisdictional EPTR.
1222	Maintenance costs for Cheyenne parks need to be analyzed. It is not accurate or useful to use standards from the City of Denver.	An analysis of maintenance costs for Cheyenne parks and open space is now included. This information has been utilized for projecting project-related maintenance costs. For further information, please see Section 2.6.2.2 of the Final Land Use EPTR.
1223	There is no effort made to include maintenance costs for new facilities.	Approximate maintenance costs for new facilities have been added. For further information, please see Section 3.2.9.3 of the Final Jurisdictional EPTR.
1224	The description of Cheyenne park facilities should include Community House (2,000 sq ft). This building is located in Lions Park and is used by the community for various social gatherings as well as by the Parks and Recreation Department in their recreational program.	This information has been incorporated and can be found in Section 3.2.9.1 of the Final Jurisdictional EPTR and Section 2.6.2.2 of the Final Land Use EPTR.
1225	It is misleading to say the majority of softball and baseball fields are leased by private	This information has been incorporated. For further information, please see Section 3.2.9.1 of

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	organizations or associations. Nine fields are leased to the Junior League and two to the Junior Babe Ruth League.	the Final Jurisdictional EPTR.
1226	Table 3.3.9-12 of the Draft Jurisdictional EPTR needs to reflect that golf acreage is not included in the parkland base. No reference is made to impact on golf course facilities or whether they are satisfactory in meeting projected population increases.	Golf course acreage has not been included in the parkland base, and this is reflected in Section 3.2.9.1. An analysis of the impact on golf facilities is included in Table 3.2.9-11 of the Final Jurisdictional EPTR. For further information, please see Section 3.2.9.3 of the Final Jurisdictional EPTR and Section 3.5.2.2 of the Final Land Use EPTR.
1227	The section dealing with F.E. Warren AFB recreation facilities appears adequate with the exception that it is generally believed that these facilities are underused and that they could serve the needs of some civilian Peacekeeper workers.	F.E. Warren AFB facilities are available only to Department of Defense civilian and military personnel. For further information, please see Sectin 3.4.7 of the Final Jurisdictional EPTR.
1228	The report is deficient in information and analysis relative to the role of the private sector. As just one example, Paragraph 1.3.11, Recreation, makes no mention of the role the private sector plays in delivering recreational services to our citizens. To exclude movie theaters, bowling alleys, night clubs, hobby stores, and other private sector recreational providers is a major omission.	Public, quasi-public, and private recreation opportunities are described in the Draft Jurisdictional EPTR. For further information, please see Section 3.2.9.1 of the Draft and Final Jurisdictional EPTRs.
1229	There is no basis for projections of impacts on local recreation. Mitigative measures in Section 3.2.9.3 of the Draft Jurisdictional EPTR should be more creative, comprehensive, and specific.	Staffing is based on 1.28 staff persons per 1,000 population, budget on $20.30 per capita (existing per capita rate), and participation is based on the rates the city provided for each of the specific activities and an age/class factor. More specific and comprehensive mitigation measures are provided now that the neighborhood analysis has been completed. For further information, please see Sections 3.2.9.1 and 3.2.9.4 of the Final Jurisdictional EPTR.
1230	More specific analyses of project impacts on recreation in South Cheyenne should be completed.	The revised local recreation analysis is neighborhood-specific (including project-related population allocations). For further information, please see Section 3.1.11.4.2 of the FEIS and

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		Appendix C of the Final Jurisdictional EPTR.
1231	More analysis of mitigations for recreation in South Cheyenne is needed.	Neighborhood specific mitigation measures for local recreation have been offered, and are included in Section 3.2.9.4 of the Final Jurisdictional EPTR.
1232	The mitigation strategy should include consideration of how to develop parks and recreation facilities and pedestrian paths and bikeways in South Cheyenne. This would include consideration of combining benefits such as reclaiming gravel pits, using flood detention areas, or other means. In addition, provision must be made for providing funds for maintenance as well as carrying it out.	Mitigations concerning the provision of parkland facilities and maintenance in areas outside the city limits have been offered, and are included in Section 3.2.9.4 of the Final Jurisdictional EPTR. They discuss options such as special recreation districts and joint venture development. Under the Memorandum of Agreement between the Department of Defense and the States of Wyoming and Nebraska, a working group is developing detailed mitigation plans and programs, recommending funding sources and levels, and identifying mechanisms for minimizing impacts caused by deployment and peacetime operation of the Peacekeeper system.
1233	Lack of institutionalized structures to establish and maintain parkland in South Cheyenne is overlooked.	A discussion concerning the lack of institutional structures available to supply and maintain parkland and facilities in Laramie County and options for mitigations is now included. For further information, please see Section 3.1.11.6.2 of the FEIS and Section 3.2.9.4 of the Final Jurisdictional EPTR.
1234	South Cheyenne, in addition to lacking pedestrian and bicycle facilities, is in need of 30.2 acres of parkland, a baseball field, a softball field, a basketball court, a volleyball court, and 3 tennis courts, according to the Draft Jurisdictional EPTR. Recommendations for specific facilities belong in a master plan based on data for the ages of residents which is not in the Final Jurisdictional EPTR.	A neighborhood analysis has been prepared based on the amount of available parkland in each neighborhood and on an age/class cohort factor. The City of Cheyenne's preliminary master plan has been consulted for specific recommendations. For further information, please see Appendix C of the Final Jurisdictional EPTR.
1235	Project impacts are assessed based upon 475 workers plus dependents. This does not appear to include Site Activation Task Force workers and their dependents. This section of the Jurisdictional EPTR should also contain discussion on the use of	Site Activation Task Force personnel will not be housed at F.E. Warren AFB. It is possible that they will use recreation facilities at the base, which would tend to alleviate pressure on the City of Cheyenne's system. It is

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	city-provided recreational facilities and services by base personnel.	correct, however, that some F.E. Warren AFB personnel can be expected to use city facilities since they are city residents or because they participate in league play. For further information, please see Section 3.2.9.1 of the Final Jurisdictional EPTR.
1236	Additional law enforcement duties will be required of the Albany County Sheriff's Department as the result of project-related increased recreational use of Medicine Bow National Forest units located in Albany County. These demands for additional service should be addressed in the Jurisdictional EPTR.	Law enforcement responsibilities, problems, and mitigation measures related to Medicine Bow National Forest have been addressed. For further information, please see Sections 10.1.1.3, 10.1.3.3, and 10.3 of the Final Jurisdictional EPTR.
1237	The fishing use figures shown on page 10-20 for Springer Reservoir are questioned due to the fact that most fish were killed because of prior irrigation rights and demands for water. Bump Sullivan Reservoir experiences 200 to 300 fishing days per year while most of Springer's use is related to boaters, waterskiers, swimmers, etc. The use for Springer is about 15,000 user days. Hunting use at Springer should be 4,625 user days instead of 1,925 based on the addition of Springer special pheasant use data (2,700 days).	These figures have been updated to reflect this information. Please see Section 2.6.2.1.5.2 of the Final Land Use EPTR.
1238	Information on facilities within the Pole Mountain Unit of Medicine Bow National Forest should be included in Table 10.1.1-3 of the Draft Jurisdictional EPTR showing visitation-to-capacity ratios of 40 percent or more. The problems at Pole Mountain should be analyzed and possible mitigation measures suggested.	Pole Mountain facilities were considered in the capacity analysis. Based on current Forest Service statistics for Medicine Bow National Forest, no Pole Mountain facilities have a visitation-to-capacity value of 40 percent or more. For further information, please see Section 10.1.1.1.1 of the Final Jurisdictional EPTR and Section 2.6.2.1.2 of the Final Land Use EPTR.
1239	Monitoring is not adequate mitigation if demand for parks and facilities exceeds supply.	The final analysis has indicated that demand will not exceed current supply in most neighborhoods. However, monitoring of recreation facilities has been identified as an option available to assure that the situation remains stable. For further information, please see Section 3.1.11.6.2 of the FEIS.
1240	Planned expansion of Curt Gowdy Park, which would satisfy project demand, is being held up for lack	The development of newly acquired land adjacent to Curt Gowdy State Park has been proposed as a

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	of funding.	mitigation in Section 3.1.11.6.1 of the FEIS.
1241	The mitigative measures included in Chapter 10.0 of the Draft Jurisdictional EPTR are not adequate as they do not include any mitigation for provision of adequate law enforcement at the state parks. Since law enforcement is already a problem at these parks, increased use related to the project will make the problems more pronounced.	Problems of law enforcement in recreation areas have been studied and a mitigation has been offered that suggests an increase in sheriffs' patrols, particularly in Curt Gowdy State Park and Medicine Bow National Forest (Pole Mountain Unit). For further information, please see Section 3.1.11.6.1 of the FEIS and Section 10.1.1.3.1.2 of the Final Jurisdictional EPTR.
1242	It is stated on page 10-44 of the Draft Jurisdictional EPTR that ratios of "staff-to-visitation indicates that no additional staffing is required for the baseline level of recreational service to continue during peak year." Since the proposed additional lead worker position for Curt Gowdy State Park as shown in Table 10.1.1-9 is no longer being proposed, the statement that "no additional staffing is required" is not valid.	Because the analysis of staffing needs related to the project-induced population is based on existing visitation-to-staff ratios, the difference between existing (1983-1984) and baseline (1984-1986 proposed) staff as shown in Table 10.1.1-9 is minor. Therefore, the relatively low total increase in activity days of participation at the park generated by the project does not warrant any additional staff when compared to existing or baseline conditions. For further information, please see Section 10.1.1.3.1.2 of the Final Jurisdictional EPTR.
1243	Studies should be included to determine where the people of the Cheyenne area, including the anticipated population increase attributable to the Peacekeeper project, would hunt and fish so that impact to Game and Fish Department programs can be determined. There is no indication in the socioeconomic study that this information was acquired.	A computerized gravity allocation model was used to determine where inmigrant populations would likely travel for participation in hunting, fishing, and a variety of other activities. This model, however, only considered designated public recreation areas where such activities presently occur. Monitoring of the recreational activities has been identified as an option available to determine specific destinations of the inmigrant population.
1244	The document lacks adequate documentation and discussion of methodology used, especially as it relates to conversion of visitation data into activity days and use of the gravity model.	The methodology contained in Appendix A of the Draft Jurisdictional EPTR is only a summary of the actual methodology. A detailed methodology description, including that related to activity day conversions and the gravity model, is provided in Appendix C of the Final Land Use EPTR.
1245	The summary statement on page 1-11 of the Draft Jurisdictional EPTR that ". . .generally no major change in the quality of the	The text now reads "low to moderate changes in quality of the recreational experience will occur."

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	recreational experience at any of the sites is expected" is not supported based upon the conclusions drawn within the study.	
1246	The impact on arts and cultural activities was not addressed in the Draft Jurisdictional EPTR.	Arts and cultural activities are included in the final analysis. For further information, please see Section 10.2 of the Final Jurisdictional EPTR.
1247	Volume 2 under Special Use Facilities stated the Kimball County Fairground is commonly scheduled for rodeo activities. This facility is used mainly for 4-H and FFA competition, not rodeo activities.	This information has been included and can be found in Section 7.2.8.1 of the Final Jurisdictional EPTR and Section 2.6.2.2 of the Final Land Use EPTR.

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1248	Professional judgments and conclusions concerning potential project impacts are based on admittedly insufficient data. Before arriving at determinations concerning the degree of impacts, even of a generic scope, and the nature of mitigation measures, a Class III survey is necessary and legally required. The lack of data is sufficient reason to refute the cultural resources section of the DEIS.	Current federal statutes and regulations do not require that a complete coverage (Class III) survey be conducted in advance of filing an EIS for a particular proposed action; however, resource inventory and evaluation are mandated in advance of project implementation. The EIS is intended to assist decisionmakers in identifying those actions that may significantly affect the human or natural environments and to offer suitable means to avoid or ameliorate such effects as a part of project planning, design, or execution. Thus, in accordance with 40 CFR 1502.22, the DEIS acknowledges the lack of complete inventory data for all elements of the project and incorporates a conservative, worst-case approach into level of impact attributions where such data gaps occur. In addition, the document specifies that resource assessments will be completed at all direct impact areas sufficiently prior to project deployment so that measures can be instituted to mitigate potential adverse impacts to important cultural resources.
1249	For large projects such as the current one, results of cultural resources literature search, infield survey, site evaluations, determinations of effect, and mitigation alternatives should be part of the DEIS. The Air Force fails to provide information on any of these steps.	Completion of all such steps is not required prior to issuance of a DEIS. Section 2 of the DEIS includes accounts of all cultural resource studies undertaken as a part of the environmental impact assessment process. These studies are ongoing. The results of additional resource inventory and evaluation that have been completed since publication of the DEIS and the Draft Cultural and Paleontological Resources EPTR are included in the final versions of these documents.
1250	One percent is not an adequate sample to provide an accurate approximation of the extent of cultural resources in the Region of Influence. How was this determined to be adequate?	Existing inventory data for the nine-county Region of Influence (ROI) do not provide a statistically reliable basis from which to estimate quantitative population parameters, such as site frequency or density. The inherent biases of the available inventory were recognized from the outset and, accordingly, neither density nor frequency estimates were made on the basis of this inventory. At the same time, the current inventory, which includes more than 2,000

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		prehistoric and historic sites, was assumed to provide a reasonable approximation of the kinds of resources that can be expected to occur in the Region of Influence, and this assumption is warranted on the basis of the sheer numbers of sites included in the sample.
1251	Two of the three previous historical overviews cited in the DEIS as encompassing the Region of Influence are not pertinent to the area.	The overviews were cited as examples of previous research within the Region of Influence, rather than as encompassing the Region of Influence in its entirety. To avoid confusion, these references have been deleted in the FEIS.
1252	Discussion of cultural resource mitigation measures is premature; lack of sufficient data results in the dismissal of avoidance as a mitigation measure. Many important sites will be destroyed rather than preserved. After conducting a Class III survey, any area that falls into the moderate and high impact categories should be avoided, and alternative areas chosen.	As stated in the DEIS, Air Force policy stresses avoidance of adverse impacts to cultural resources. In those instances where impacts to important resources cannot be mitigated by avoidance or relocation, mitigation measures will include development of site-specific plans to recover, analyze, and curate such resources. For further information, please see Section 3.1.12.4 of the FEIS.
1253	The DEIS fails to assess the potential damage to cultural sites (i.e., vandalism and pothunting) caused by the influx of Peacekeeper labor force.	Potential population-induced effects are addressed in Sections 3.1.12.2, 3.1.12.4, and 3.1.12.5 of the DEIS, and were a major factor in delineating the boundaries of the Region of Influence.
1254	The DEIS does not elaborate on the difference between prehistoric and American Indian cultural resources.	Definitions of these resource elements were given in Appendix B of the DEIS, and Sections 1.2 and 4.0 of the Draft Cultural and Paleontological Resources EPTR. These definitions have been clarified in the FEIS and in the Final Cultural and Paleontological Resources EPTR and are included within the text for easy reference.
1255	The observation that recorded densities of prehistoric sites reflect the extent of prior inventory work in the area rather than actual site densities should be emphasized and extended to historical and paleontological resources as well.	As noted, this observation has been extended to historical and paleontological resources in the FEIS.
1256	The Air Force's cultural resource management program should include survey of areas affected	Cultural resources inventory and evaluation are ongoing. The status of these studies is identified

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	by the project, evaluation of resources, and mitigation of adverse impacts as described in the DEIS, Sections 3.1.12.4 and 3.1.12.6. The Wyoming State Archives, Museums and Historical Department will then be able to comment in more detail.	in Sections 2.1.12.2.1.1. and 2.1.12.2.2.1 of the FEIS and Sections 2.6.2.2 and 2.6.2.4 of the Final Cultural and Paleontological Resources EPTR.
1257	The EIS should describe how the agency plans to meet its obligations for consultation under the National Historic Preservation Act.	Procedures are outlined in Section 3.1.12.4 of the DEIS, and further amplified in Section 3.2 of the Draft Cultural Paleontological Resources EPTR. Measures are further detailed in Section 3.1.12.4 of the FEIS and Section 3.2 of the Final Cultural Paleontological Resources EPTR.
1258	The Nebraska State Historic Preservation Officer has determined that the DEIS and Draft Cultural Resources EPTR together provide a very complete overview of cultural resources and consideration of project effects.	Noted.
1259	What is the extent and location of cultural resources work anticipated for Albany County? How will you make sure that investigators chosen to do the work will be qualified in this culture area?	Project plans will result in no direct effects in Albany County and no cultural resources survey work is anticipated at this time.
1260	The DEIS states that adequate information is not available to identify all properties that will be affected by the project, and "as further data to predict the precise numbers, kinds, and conditions of resources subject to direct or indirect project effects becomes available, level of impact determinations will become increasingly more objective and resultant assessments will be incorporated into the resource management process." What does this mean? Will such predictions be made after the EIS process is finished? How can the public assess impacts without adequate information?	The cultural resources assessment and management program for the Proposed Action has been designed to include provisions for dealing with circumstances in which imperfect knowledge exists regarding the numbers, kinds, or importance of resource localities potentially subject to project impacts. In such situations, worst-case scenarios have been used to establish impact levels for specific project elements. Nevertheless, as additional inventory and assessment data become available, all areas subject to direct project impacts will be the focus on onsite professional evaluation. This information will be incorporated into resource management planning. Obviously, this is a matter of "specification" and not "prediction". Consequently, in order to avoid possible confusion, the passage quoted from the DEIS in the comment has been amended in the FEIS.
1261	Where are the cultural resources sites mentioned in the DEIS, Section 3.1.12.4 plotted?	Approximate locations of selected sites are included in Section 2.6.2.1 of the Draft Cultural

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		and Paleontological Resources EPTR. Information on exact site locations is exempted from disclosure by the Archeological Resources Protection Act (16 USC 470 hh), and is therefore not given. Such information is on file at the respective State Historic Preservation Offices.
1262	Cultural resource site densities on inventoried Air Force land should not be projected to areas of land that are relatively undisturbed. How will this be addressed? How will the results of the recent onbase inventory affect site density predictions?	Previously inventoried land within the nine-county Region of Influence represents a biased sample that cannot be used to generate reliable quantitative estimates. Predictions of site density, therefore, will not be made for either onbase or offbase areas. For further information, please see Section 2.6.2.3 of the Final Cultural and Paleontological Resources EPTR.
1263	The DEIS states that the Air Force has no real plan to deal with cultural resources in the impacted areas. Despite federal legislation which mandates the protection of resources, it appears that potentially significant cultural resources will be destroyed. How do you propose to implement a more rigorous plan for the protection of such resources?	The Air Force's plan for the mitigation of impacts to cultural resources as a result of the project is outlined in Section 3.1.12.4 of the FEIS and Section 3.2 of the Final Cultural and Paleontological Resources EPTR.
1264	Who is funding the archaeological work in the area?	The U.S. Air Force is funding cultural resources investigations in areas subject to direct project impacts.
1265	Who is ultimately responsible for cultural resource protection and/or mitigation?	The Air Force, in consultation with the Advisory Council on Historic Preservation and the State Historic Preservation Officer, is responsible for protection of cultural resources on land it controls.
1266	Who will conduct the cultural resource work that is still required in the area? What are their qualifications in the cultural area? What professionals will oversee mitigative measures?	The Air Force will use qualified cultural resource specialists, as defined in 36 CFR 61.5, to accomplish the work required in the area, including monitoring.
1267	Additional Native American groups and agencies such as the American Indians Against Desecration should be consulted for information on burial policies and sacred sites in the region.	Comments from additional Indian groups will be solicited as part of project planning.
1268	American Indians Against Desecration requests to work directly with agency social scientists on	Noted.

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	American Indian issues.	
1269	American Indians Against Desecration requests the identification, location, and reburial of the Indian ancestors previously removed from throughout the Region of Influence.	No burial remains have been found or removed during cultural resources studies done in connection with this project. The Air Force has no authority where excavations may have occurred by other groups or agencies. Such records regarding past excavations are maintained at the respective State Historic Preservation Offices.
1270	The investigators who performed the work for the DEIS in Cultural Resources were not qualified to conduct the present studies.	Persons in charge of cultural resources studies were chosen for their knowledge of the subject, familiarity with the EIS process, and managerial skills. Field personnel were selected who were familiar with field techniques and who had a current working knowledge of Great Plains archaeology, particularly within the Region of Influence. Other persons with local expertise served as consultants for particular tasks or provided peer reviews for certain aspects of the project.
1271	The impact rating of not significant assigned to paleontological resources should be reconsidered. Fossils can be found almost anywhere along Horse Creek and adjacent areas.	It is recognized that fossil material is present within the Region of Influence. The impact rating is based on the scientific importance of known paleontological resources, and at present none of recognized importance are known to be subject to direct project impacts. Inventory and assessment of paleontological localities are part of ongoing field studies within areas of direct project impacts. As further data become available, they will be incorporated into the resource management process. For additional information, please see Sections 2.6.5.2 and 3.5.4 of the Final Cultural and Paleontological Resources EPTR and Sections 2.1.12.2.4 and 3.1.12.4 of the FEIS.
1272	Since the proposed action would result in irreversible adverse impacts to cultural and paleontological resources, the draft EIS incorrectly characterizes the impact as "low".	It is assumed that proposed mitigation measures will result in the avoidance or lessening of most project impacts, and therefore unavoidable impacts will be slight. Section 3.1.12.7 of the FEIS has been amended to clarify this point.
1273	The Wyoming State Historical Preservation Officer (SHPO) concurs that the overview's treatment of	The Air Force recognizes its responsibility for preservation and management of important cultural

7.2.12 CULTURAL AND PALEONTOLOGICAL RESOURCES

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	prehistoric, American Indian, and historic resources is adequate for this stage of the project. Before project clearance can be recommended, however, findings of current cultural resources investigation must be presented, including a discussion of potential project impacts and resource evaluations.	properties potentially subject to impacts from the Proposed Action and will continue the ongoing consultation and coordination process with the Nebraska and Wyoming SHPOs. In this regard, the Air Force will supply such information as the SPHOs need in a timely fashion to insure that effective mitigation measures are developed and implemented for specific project elements.
1274	Since no ground-disturbing activities are to take place within the State of Colorado, the Colorado State Historic Preservation Officer finds that there will be no effect on Colorado's cultural resources by the proposed project.	Noted.
1275	How will you deal with the large amount of cultural resources that you will undoubtedly encounter? How is the public to assess the manner in which you plan to treat these resources since it is not stated specifically in the DEIS?	Cultural resources management plans were outlined in Section 3.1.12.4 of the DEIS, and Section 3.2 of the Draft Cultural and Paleontological Resources EPTR. For further information, please see Section 3.1.12.4 of the FEIS, and Section 3.2 of the Final Cultural and Paleontological Resources EPTR.
1276	Until archaeological inventory is conducted to identify and avoid significant sites, project planning and/or ground disturbance within the Region of Influence should not take place.	It is not anticipated that ground disturbance will occur prior to inventory. Project planning, however, has no adverse effect on cultural resources, and can provide the means to direct project impacts away from known or high potential resource areas.
1277	Given the statement made in the Draft Cultural and and Paleontological Resources EPTR on page 2-125, paragraph 3, regarding the 1868 Fort Laramie Treaty and the Treaty of 1871, the obvious conclusion is that the 1871 Treaty is invalid and the 1868 Fort Laramie Treaty is still in effect. Therefore, until consultation and/or comp sation is made as per the requirements of the 1868 treaty, no action should be considered within the Region of Influence.	The Air Force did not mean to imply a legal interpretation of the validity of the treaties.
1278	The proposed Programmatic Memorandum of Agreement for the management of cultural resources at F.E Warren AFB should be extended to include protection of all significant archaeological sites	The Air Force is only responsible for the management of cultural resources under its jurisdiction. The proposed Programmatic Memorandum of Agreement (PMOA) will detail how that will be carried

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	within the Region of Influence.	out and is intended to provide for long-term management of all cultural resources located on F.E. Warren AFB and replaces an earlier Memorandum of Understanding (MOU) that has been in force since the mid 1970s. Although this PMOA is not a Peacekeeper-related document it can serve this need for onbase resources potentially affected by the project. It is likely that a similar agreement will be developed to provide a framework for resource management in the Peacekeeper deployment area.
1279	Contrary to statements made in the Draft Cultural Resources EPTR, the Region of Influence includes locations of herbs and medicinal plants currently utilized by spiritual men. Furthermore, anticipated burial sites are indicative of sacred areas of immediate, traditional, sacred and secular value. Additional information through consultation must be solicited for potential project effects. In addition, it is implied in the EPTR that: 1) since the Region of Influence has not been occupied by Indian people in recent years, it is not sacred, 2) sacred areas are those of recent occupation, or 3) an area is sacred only if occupied. All three statements are incorrect.	Additional Indian groups will be consulted regarding sacred sites and traditional use areas as part of the project Comprehensive Resource Management Plan. The statement made on page 3-17 of the Draft Cultural and Paleontological Resources EPTR has been deleted in the Final Cultural Resources EPTR in view of the implications noted.
1280	Do the prehistoric remains mentioned in the Draft Cultural Resources EPTR, Section 3.5.1.1, paragraph 4 refer to burial remains? American Indians Against Desecration strongly object to such desecration as well as to the conduct of any research on such remains. Test excavations should not be conducted without a Memorandum of Agreement and without consultation with traditional Indian groups.	No burial remains have been excavated or encountered at F.E. Warren AFB or in the Deployment Area during current cultural resources studies required for the EIS.
1281	Additional information is needed regarding consultation with 'Indian Representatives' mentioned in the Draft Cultural Resources EPTR to determine whether legal compliance was met as per the American Indian Freedom of Religion Act, the 1966 Historic Preservation Act, and the National Environmental Policy Act.	Information was collected from American Indian groups, which included the Wind River Arapaho Business Council (Boulder, Colorado) and the Northern Cheyenne (Billings, Montana), to obtain information about aspects of traditional tribal life (religions practices, burial localities, collection of medicinal plants) that potentially

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		could be affected by deployment of the Peacekeeper missile in the Region of Influence. Copies of the DEIS and the Draft Cultural and Paleontological Resources EPTR were submitted for review and comment to several agencies having responsibility for American Indian concerns, including the Nebraska Indian Commission in Lincoln and Scottsbluff, and the U.S. Department of the Interior, Bureau of Indian Affairs (BIA) Realty Offices in Billings, Montana and Alburquerque, New Mexico, and Aberdeen, South Dakota. In addition, the Cultural Resources Management Plan (CRMP) for the Proposed Action, which will be implemented prior to system deployment, specifies that an ongoing program of consultation and coordination will be developed with appropriate American Indian groups to guarantee a forum for incorporation of tribal concerns at all stages of project planning, deployment, and operations.

7.2.13 VISUAL RESOURCES

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1282	Figures No. 2.6.3-10 and 2.6.3-12 should be reversed.	This error has been corrected in the Final Land Use EPTR.

7.3.1 WATER RESOURCES

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1283	Need to analyze how increased water demand will affect land use and development potential.	The analysis of water resources included consideration of anticipated future development under the baseline conditions without the project. Project impacts were then added to this baseline growth to determine ability to meet demand including all anticipated increases. Thus the potential for water supply for future development is addressed. All potentially impacted communities except Cheyenne appear to have water supply available to meet development demands. Enhancing supplies to Cheyenne will increase the potential for future development after the peak project demand period. Water use and demand are discussed in Section 3.5.1 of the Draft and Final Water Resources EPTR.
1284	The exact locations, extents, and consequences of impacts on the Crow Creek watershed should be described in Section 3.2.1.5.1. of the DEIS.	The DEIS and FEIS summarize the detailed information contained in the Draft Water Resources EPTR. Please see Section 3.5 of the Final Water Resources EPTR for environmental consequences of the no action alternative and proposed action in the Crow Creek watershed.
1285	Credit is not given to the Conservation and Survey Division of University of Nebraska, Lincoln as a data source.	The Conservation and *Survey Division of the* University of Nebraska, Lincoln, was listed in Section 2.4 of the Draft Water Resources EPTR. The FEIS has them listed in Section 2.2.1.1.2.1.
1286	The drought analysis should be based on statistical analysis of precipitation to be useful in water supply projections for Cheyenne.	Additional analyses based upon long-term precipitation records were included in the FEIS and the Final Water Resources EPTR which indicates a 1-in-10-year drought would reduce supply available to Cheyenne from Crow Creek by 900 acre-ft per year.
1287	Harsh weather could delay construction of the Stage II project for Cheyenne causing increased impacts of using existing supplies available to Cheyenne. Also, weather delays of project construction could extend the construction period and increase the amount of water used.	The timing of the availability of water to Cheyenne from Stage I and Stage II in light of present construction was provided by the Cheyenne Board of Public Utilities, which has considered this type of delay. The project construction schedule used in the analysis considers weather effects on construction.
1288	Where will water for silo modification come from?	The source of water will be private or public wells in the general vicinity of the silos. The

7.3.1 WATER RESOURCES

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		Air Force has identified all such wells and plans to negotiate water use agreements for temporary use of water from existing wells. The program will be coordinated with the Wyoming State Engineer's office and the Nebraska Department of Water Resources to insure all legal requirements for such water use are met.
1289	How will construction water be delivered to construction sites? By pipeline, tanker truck, or what?	Water will generally be trucked from an existing well to the site of use after appropriate legal requirements to allow use of that water have been met.
1290	The change in type of use for water was not addressed nor was the replacement of water for users who sell or lease water for this project.	In general, if a temporary water use agreement is made, an irrigator or other user will be required to reduce present use by the amount of water covered by the agreement. The relatively small quantities of water involved should not adversely impact the present user. Both the DEIS and the Final Water Resources EPTR fully document the restrictions on changes in type or place of use.
1291	Water rights exceed water use and water availability in Wyoming and need to be secured in Nebraska.	If existing water rights are used in Wyoming this situation wouldn't change. No groundwater right as such is required in the Deployment Area in Nebraska.
1292	The DEIS does not reference pollution control standards and implies that some project activities will be done that do not comply with standards.	The Air Force will comply with applicable laws and regulations in project construction. Applicable standards are detailed in the Draft and Final Water Resources EPTR.
1293	Attention needs to be given not only to water level changes, but also to water quality.	Both factors are assessed in the FEIS and Water Resources EPTR. A monitoring program for both water level and quality has been suggested. Please see Section 3.7.3.4 and 3.7.4.4 of the Final Water Resources EPTR for further information.
1294	How does the amount of water required for project construction compare with amounts needed for an average ranch or some of the towns in the area?	The total construction demand of 516 acre-ft needed over the six-year construction period about equals the amount the community of Pine Bluffs uses in one year and is about one half of what the City of Kimball would use in one year. Based on a water application rate of 3 acre-ft per acre per year, the amount of water projected

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		for construction demand would irrigate a 172-acre field for one year. This is about the size of coverage of one of the center pivot irrigation rigs used in the area.
1295	The DEIS does not evaluate alternative sources of water in sufficient detail to assess their feasibility.	The DEIS is a summary of information contained in other planning reports. Alternative water sources are presented and evaluated in these documents. Please refer to the Draft and Final Water Resources EPTR, Section 3.5.1.2.4 and the two water supply development plans for the Wyoming and Nebraska deployment areas.
1296	Will water rights for Crow Creek watershed be acquired by filing for new rights or buying up old ones?	The Air Force will acquire all water in Wyoming according to the requirements of Wyoming water law. The "Peacekeeper Water Supply Development Plan - Wyoming Deployment Area" has been prepared for the Air Force. At this time no single altlernative has been selected for the Crow Creek area. The alternatives are discussed in Section 5.1 of the referenced document and in Section 3.5.1 of the Final Water Resources EPTR. If water rights were to be acquired, the present plan would be to purchase existing rights that show documented historic use.
1297	What is the impact on the Cheyenne Stage II project and how will use of water affect Cheyenne and Casper? (Casper is supposed to be able to purchase water from Cheyenne).	The Peacekeeper project has no direct impact on Stage II other than using water delivered to Cheyenne. Effects of the Cheyenne Stage II project were addressed in the FEIS for the Cheyenne Stage II project (USDA, 1981). Since the volume of water used (baseline plus project) is within the amount to be supplied by Cheyenne (from all its sources: surface water, groundwater, and transmountain diversions) the Stage II project will not be affected. The Stage II project discussed in the DEIS and FEIS does not effect water available to Casper.
1298	The plan to reuse wastewater in 1985 will lead to depletion of the source of downstream recharge.	Water reuse in 1986 and beyond will not lower downstream recharge. This is because the water reused will be additional water brought in to meet induced demand. Recharge would not increase as it might if the water used in Cheyenne due to the projects were treated and released from the

7.3.1 WATER RESOURCES

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		Cheyenne area sewer system. It should be noted that the present amount of effluent from Cheyenne is fully appropriated. Therefore, wastewater reuse cannot legally reduce effluent flows to less than the appropriated amount (about 6.8 mgd or 7,6000 acre-feet per year).
1299	It is difficult to verify DEIS projections, methods, or analysis results for water resources based on data in the DEIS.	Methods, projections, and resultants for all quantifiable water resources impacts are detailed in the Draft and Final Water Resources EPTR.
1300	The DEIS ignores the impact of increased water use in Crow Creek basin on water users in Colorado and fails to identify mitigation measures to protect such users from increased use.	The DEIS is a summary document. The Draft Water Resources EPTR evaluates the potential impact due to induced population changes in the Greeley and Fort Collins area and concludes negligible impacts would occur. Increase water use in Cheyenne would result in increased wastewater discharges which could ultimately increase water available to Colorado users. The overall change in surface water flow in Crow Creek due to the project was evaluated and found to be negligible and insignificant. Mitigations are identified for impacts that are significant which is not the case for water resources impacts in the Crow Creek watershed outside the Area of Concentrated Study. The FEIS and Final Water Resources EPTR delete references to Greeley and Fort Collins since no induced population has been projected for those areas.
1301	The water supply projections for Cheyenne assume wells can be used, irrigation water used from that supply will not increase, and ignores evaporation and spillage losses.	The production capacity of the wells has been evaluated and can yield required amounts of water. The portion of the supply from wells used for irrigation is not expected to increase since contracts limit use. Evaporation and spillage losses are considered in calculating net import available for use in Cheyenne. For further information, please see Sections 3.5.1 and 3.5.4 of the Draft and Final Water Resources EPTR.
1302	The projected water supply shortage in Cheyenne is too much to be met by increased groundwater mining.	The Cheyenne Board of Public Utilities plans to meet shortages caused by the construction of Cheyenne Stage II by increased wellfield pumpage and withdrawal of water from storage in Crow Creek reservoirs. Wells would be pumped

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		at less than peak historic rates but greater than desired rates during this temporary period.
1303	The 3,645 acre-ft of water needed for deployment of the M-X project should not create any major demand upon the water resources of the area. The existing water delivery capabilities of all the municipal systems involved will be adequate with the possible exception of the Cheyenne municipal system if construction delays occur with Stage II. Water for temporary construction purposes is available through temporary use agreement procedures or temporary appropriation procedures.	General conclusions of this comment concur with the DEIS. The actual values for water use and demand are slightly lower than the DEIS values.
1304	The DEIS is unclear relative to the need for an additional pipeline to take full advantage of the Cheyenne Stage II project.	The capacity with a single pipeline is shown as 12,400 acre-ft/yr with capacity with a second pipeline shown as 23,000 acre-ft/yr in Section 2.2.1.2.1.1 of the DEIS. The Draft and Final Water Resources EPTR discuss the need for a second pipeline to take full advantage of the Cheyenne Stage II project in more detail.
1305	What will be the impact when demand exceeds supply and how will the Cheyenne Board of Public Utilities meet these demands?	New analysis of population inmigration and project labor requirements for the FEIS has resulted in modified water demand projections. As a result, the project-induced shortfall of 190 acre-ft in 1985 is no longer projected. However, it is possible that demand could exceed supply in any given year, both with or without the project, due to drought conditions. The Final Water Resources EPTR discusses measures that could be used to meet a shortage. The supply figures presented in the documents are based on pumping the nominal amount of 2,500 acre-ft per year from the wellfields and not lowering the levels of Crow Creek Reservoirs. By increasing pumping rates, taking surface water from storage or a combination of the two the Cheyenne Board of Public Utilities could likely meet any anticipated shortages in the near future either with or without the project.
1306	In reference to p.2-94 of the DEIS, use 1980 as a base year for Cheyenne water supply and demand analysis because it was a census year with	For water demand in Cheyenne, 1980 was used as the base year, even though water use in 1980 was higher than in other recent years. An adjustment

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	accurate population data.	for civic water use was applied to the 1980 data. Then per capita rates were developed based on 1980 water use and population. For more information, please refer to Sections 2.6.1.1.1.1, 3.1.1.1, and 3.5.1.1.1.1, of the Draft and Final Water Resources EPTR. For water supply, the use of a single year of data is inadvisable due to the variability of supply with annual climatic conditions. The period 1976-1982 was used to document water supply for several reasons: Detailed information was available for those years from the Cheyenne Board of Public Utilities; average precipitation for this period agreed closely with the long-term average; and both extremely dry and wet conditions are included in this period. Further information can be found in the Draft and Final Water Resources EPTR, Section 2.6.1.1.6.1.
1307	During Stage II construction (1982-1986), annual water supply will vary from the historical base due to interruption of Stage I water delivery. After 1986, supply will increase due to project completion.	Stage II construction is considered in assessing future water supply, as discussed in Section 3.2.1.4.1 of the FEIS. From 1986 on, the increased capacity is also noted, with corrections for anticipated losses. For further information, please see Section 3.5.1.1.1.1 of the Draft and Final Water Resources EPTR.
1308	Average net yield of Crow Creek should be 3,560 acre-ft, not 4,600 acre-ft, based on inflow less losses.	The Cheyenne Board of Public Utilities method of calculating Middle Crow yields assumes that all Stage I diversions to Crow Creek, less pipe losses, reach the Crystal Reservoir meter which measures water supplied to the Cheyenne Board of Public Utilities system. All stream, reservoir, and overflow losses in the Middle Crow Creek watershed are therefore attributed to the Middle Crow Creek basin by this method. In the DEIS, FEIS, and Draft and Final Water Resources EPTRs, these losses are allocated to the sources in proportion to volumes generated by each source to more accurately portray the physical system. The Final Water Resources EPTR, Section 3.5.1, has been changed to present more clearly the caculation methods used.
1309	Include additional water supply information in tables in Section 3.2.1.4.1.2 of the FEIS,	Text and tables have been added to incorporate this information in Section 3.2.1.4.1.2 of the

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	specifically excessive well field production, reservoir storage, and changes in water demand due to the project.	FEIS.
1310	Tables 3.2.1-2 and 3.2.1-3 in the DEIS should be modified to show the total increase in demand on the Cheyenne Board of Public Utilities system due to the project.	Table 3.2.1-3 and Figure 3.2.1-1 in the FEIS, as well as Tables 3.5-10 and 3.5-11 in the Final Water Resources EPTR, show the total project related demand on the Cheyenne Board of Public Utilities system.
1311	To maintain emergency reservoir storage the 3,926 acre-ft of project induced demands must be met by alternate sources, such as groundwater. Because of overpumping in 1983, 1984, 1985, 1990 and 1991 to meet baseline demand, additional overpumping creates a risk which is significant and must be considered.	The comment is based on incorrectly including the induced demands for the entire Region of Influence in the demands on the Cheyenne Board of Public Utilities system. The total induced demand on the Cheyenne Board of Public Utilities system during the construction period is about 2,400 acre-ft, as opposed to 3,926 acre-ft. In addition, new analysis of population inmigration and labor requirements indicates that overpumping will only be required in 1983 and 1984 to meet baseline demands. Project impacts would require additional overpumping of 70 and 80 acre-ft in 1984 and 1991, respectively. Based on the revised demands, these pumping rates could be utilized without reducing storage in reservoirs below desired reserve levels. This is further discussed in Section 3.5.1.2.2.1 of the Final Water Resources EPTR.
1312	Overpumping of wellfields could reduce flow of springs and lower groundwater levels.	This is discussed in Section 3.2.1.4.4 of the DEIS and FEIS.
1313	It is the responsibility of the Federal Government, not the Cheyenne Board of Public Utilities, to mitigate project impacts on water demand.	Potential mitigations are identified in Section 3.2.1.6 of the FEIS along with the appropriate party to administer the mitigative actions. As indicated in that section, that party would not necessarily pay mitigative or administrative costs. Under the Memorandum of Agreement among the Department of Defense and the states of Wyoming and Nebraska, a mitigation plan will be developed and agreed to by all parties. It will set forth specific measures to mitigate adverse impacts of deployment of Peacekeeper missiles.
1314	Water quality in Crow Creek and other watersheds should be characterized by salient chemical and	Such a characterization has been made. The DEIS is a summary of detailed analysis and results

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	physical parameters, not qualitative judgments. Also, streambed and channel morphology and locations and extent of important riparian zones should be described.	found in the Draft Water Resources EPTR. Section 2.6.3 of the Draft and Final Water Resources EPTR contains the information noted with quantitative information regarding water quality. The Draft and Final Biological Resources EPTR details important habitats including riparian zones.
1315	A drought could increase wind erosion.	Noted.
1316	Erosion rates as given in tons/year are meaningless and rates as given do not represent rates in the Great Plains region as shown by rates in the Geologic Resources section of the DEIS.	Watershed areas and erosion rates are given in Section 2.2.1.2.3.2 of the DEIS and FEIS. Erosion rates used to represent existing conditions are from the southeastern Wyoming area. Given the tons/year values and watershed areas, one could calculate average watershed erosion rates of 4.2 tons/acre/year (t/ac/yr) for Crow Creek, 3.4 t/ac/yr for Lodgepole Creek, 3.7 t/ac/yr for Horse Creek, 3.6 t/ac/yr for Pumpkin Creek, and 4.1 t/ac/yr for Chugwater Creek watersheds. These values are consistent with the 4.1 and 5.2 t/ac/yr values used by the Geologic Resources analysis to typify soils in the area most subject to erosion.
1317	Lodgepole Creek Reservoirs (and others) are already subject to sedimentation problems and you have underestimated the impact of the project on increasing this problem.	Existing sediment delivery upstream of Oliver Reservoir is estimated in the FEIS at 309,000 tons/year which for the 1,160 square miles involved is 0.42 tons/acre/year. Increases, if erosion were not controlled, would be 0 to 1.4 percent on a watershed (regional) basis. The Draft and Final Water Resources EPTRs provide data for each watershed relative to the project impact. For Lodgepole Creek above Oliver Reservoir sediment delivery is forecast to increase 0.8 percent without controls. The Final Geologic Resources EPTR indicates erosion controls will reduce erosion in disturbed areas 60 to 80 percent below existing erosion rates.
1318	Increased erosion will aggravate existing poor water quality downstream of Cheyenne.	Erosion and sediment delivery are forecast to increase 1.4 percent over existing conditions without controls in this area of Crow Creek. Application of assumed erosion control practices on F.E. Warren AFB will not cause an increase. The maximum 1.6 tons/acre/year of erosion with controls is less than existing erosion rate of

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		4.2 tons/acre/year. Similar controls would also result in no impact from project-related urban development in Cheyenne. Since this can not be assured a moderate and significant impact was assigned to the increase in the Cheyenne urban area and the impact of a 0.6 percent increase in sediment delivery downstream of Cheyenne was given a low and significant impact rating.
1319	An inadequate monitoring plan is presented relative to assuring construction erosion control practices would be effective in controlling erosion and sedimentation in Crow Creek.	Although the DEIS indicates there should be little impact on Crow Creek if erosion practices are used in construction, additional consideration has been given in the FEIS to assure that such practices will be implemented and appropriate monitoring will be done where required to comply with state and/or federal regulations.
1320	No changes in controls on water use or water quality protection are forecast.	This is true based on discussions with regulatory agencies in the area. Project facilities will be constructed to meet existing regulations, laws and requirements.
1321	Where in the Crow Creek watershed are erosion and siltation expected to originate? What distances downstream from these origins are expected to be affected?	Erosion and siltation impacts will originate at the point where development occurs. On F.E. Warren AFB these are areas of new construction and construction upgrade (e.g., roads, buildings, etc.) See Section 3.5.3.2.2.1 of the Final Water Resources EPTR for location of road upgrades. Within the City of Cheyenne development is projected to occur in the areas identified in Section 3.5.3.2.1.1 of the Draft and Final Water Resources EPTRs. The maximum downstream point affected by erosion and siltation from the Cheyenne area is expected to be the Wyoming Hereford Ranch Reservoir No. 2 because the reservoir acts as a sediment trap. Any erosion and siltation impacts below the Wyoming Hereford Ranch Reservoir No. 2 will not extend past Carpenter, Wyoming, since the entire flow of Crow Creek can seep into the quaternary alluvial deposits upstream of Carpenter.
1322	There is concern that there is not enough information on the groundwater conditions to adequately assess the impacts of the project.	All groundwater will be acquired and used by the Air Force according to the applicable state water law. Where insufficient data exist for

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	Also, a more general question is: How will the project affect the existing groundwater supply?	assessing groundwater supplies, the water supply development program will identify what field programs are needed to acquire the information. Since state water laws will be followed, the project should have only minimal impact and not adversely affect groundwater supply because the laws are designed to protect these supplies.
1323	Due to the discrepancy between the speed of groundwater withdrawal and the speed of groundwater recharge, residents of the Area of Concentrated Study must concern themselves with adverse effects of groundwater use. Care must be taken so that short-term groundwater adverse effects do not become long-term adverse effects.	Additional groundwater use, which is induced by the Peacekeeper project, will be acquired in accordance with Wyoming and Nebraska water law. Within the existing constraints, impacts of new groundwater usage are extremely limited. A complete explanation of the potential impacts and methods used for impact determination is provided in Sections 3.5.4.2.1 and 3.6.1.4.1 of the Draft and Final Water Resources EPTRs. Also, Section 2.6.2.1 of the Draft and Final Water Resources EPTRs summarizes statutory constraints.
1324	A cone of depression map should be provided to show where the water tables would be located for different stages of the project. A map of this type should provide information to determine whether project wells would change groundwater levels to the extent that wells would be affected.	This type of map could not be provided because it is a function of the site-specific impacts of individual wells which have not yet been selected. On a general basis, Section 3.2.1.4.4 of the DEIS and FEIS and Section 3.5.4.2.1.2 of the Draft and Final Water Resources EPTRs give approximate drawdown values for potential wells. When precise locations of wells are known, then plans exist to meet requirements of the states which could include development of such maps.
1325	Will gravel mining in shallow alluvium affect groundwater quality?	No water quality impacts would be expected on groundwater. Gravel mining in the shallow alluvium could cause a slight increase in surface water turbidity.
1326	The DEIS states use of water from the Ogallala aquifer is short-term and not significant, but that aquifer is vitally important to 8 states and depletion of the aquifer is a serious concern.	The Air Force is aware of the importance of this aquifer. The relatively small quantities of water required for the Peacekeeper project are not expected to have a measurable impact on the aquifer as a whole. Local impacts are noted where they may occur.
1327	The important aquifers in the Pumpkin Creek Valley are the Brule and the alluvium, yet information	Additional information regarding the aquifers in the Pumpkin Creek Valley is presented in the

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	regarding well yields is given only for the Chadron and Arikaree aquifers.	Final Water Resources EPTR in Section 2.6.4.3.5.
1328	Potential water level lowerings were presented for the Arikaree and Ogallala aquifers; estimates for water level lowerings for the Brule and alluvium are not given.	The Ogallala and Arikaree aquifers are the most important acquifers in the overall Region of Influence. The Brule aquifer yields significant amounts of water only in areas where it is highly fractured. These conditions do not meet the assumptions required to estimate drawdown by the methods used in the Draft Water Resources EPTR. (Hantush-Jacob, Weber, Theis, and Glover methods). Therefore, reliable drawdown estimates could not be calculated. The alluvium also does not fit the necessary assumptions to be accurately modeled. Finally, the water development plan does not anticipate large usage (if any) of water from the alluvium or the Brule aquifers in the Pumpkin Creek Valley area for the project.
1329	How will radioactive spills affect groundwater quality?	The project does not include radioactive materials in a form that might contaminate groundwater and no spills are anticipated. However, Air Force plans for responding to such an emergency are discussed in Section 1.6.10 of the DEIS and FEIS.
1330	The increase in dissolved solids and nitrate downstream of Cheyenne may violate Wyoming law that prohibits impacts on groundwater quality.	Increases are expected in both the baseline growth and project impact conditions. Though concentrations may increase, the groundwater quality has been forecast to still meet water quality standards of Wyoming. Wyoming water quality regulations state that discharges must not make the groundwater unsuitable for its intended use. Groundwater below Cheyenne is used primarily for irrigation. The increases expected in total dissolved solids and nitrate will not cause irrigation use to be excluded.
1331	The DEIS should address the potential of ground subsidence due to groundwater use in the deployment area.	The potential for subsidence is rated as very low based on aquifer characteristics and amount of water required. This issue is addressed in the Draft and Final Water Resources EPTR, Section 3.5.4.2.3.
1332	Because of the time period required for groundwater to recover its capacity it could take	Since the Air Force is acquiring and using water according to the applicable water law of each

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	up to ten years for someone's supply to recover. What if this occurs to someone who relinquished his/her supply on a temporary basis?	state, and the laws are designed to protect the water resource, the Air Force will not be able to use any water at a rate greater than it would have been used by the previous owner. Therefore, persons who have relinquished, or more probably, leased, their rights for a short time would find the groundwater supply in the same condition after the Air Force had used the water as they would if they had used the water themselves.
1333	Some of the City of Cheyenne wellfields are near the Cheyenne waste disposal landfill which is unlined and those wells should be pumped less and not more because of possible health concerns of leakage contaminating the water supply.	This situation was discussed with the Wyoming Department of Environmental Quality who indicated no evidence of contamination to date. The Air Force in conjunction with the Cheyenne Board of Public Utilities is exploring means of renovating, relocating, or otherwise upgrading the wellfields to meet the demands of the project.
1334	The availability and impact of water use in areas other than the Crow Creek watershed is not addressed in sufficient detail.	The small project water requirements in areas other than Crow Creek in relation to water use in those areas, coupled with the likely temporary purchase or lease of water, indicates there may be little increase in overall water demand due to the project outside of the Crow Creek watershed. The Draft and Final Water Resources EPTRs, however, examine the availability and potential impact of water used in these areas.
1335	What guarantees can be provided so that use of legally acquired water rights do not deplete the groundwater supply to the extent that it can never be rejuvenated.	The Air Force has committed to acquiring and using water according to the applicable state water laws. These laws are designed and enforced to protect the groundwater resource. Use of water from existing rights is limited to the amount used by the registered owner. This amount, as defined in the appropriation permit, has been set so that aquifer depletion is minimal.
1336	Radiation leaks and contamination of the Ogallalla aquifer would be disastrous.	The DEIS states that no such leaks or contamination are expected (Appendix D, Water Resource issue I-4). Air Force plans for responding to such an incident are discussed in Section 1.6.10 of the DEIS and FEIS.
1337	The more water which is removed from the Crow Creek system, the less is available for	The small amount of additional water required compared to available supplies should not

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	groundwater recharge.	substantially affect groundwater recharge. For further information, please see Section 3.2.1.4.1 of the FEIS and Section 3.5.1.2 of the Draft and Final Water Resources EPTRs.
1338	Why is there no specific information on site impacts due to groundwater withdrawal outside of the Cheyenne urban area?	Potential water level lowerings are forecast. Since actual sites for construction water withdrawals have not been determined, it is not possible at this point to determine site-specific impacts from these withdrawals. However, prior to construction, site-specific analyses will be performed and specific monitoring programs developed and implemented as required to assure that applicable requirements to impacts of groundwater withdrawal can be found in Section 3.5.4 of the Draft and Final Water Resources EPTRs.
1339	Construction water demands (primarily roads) could adversely affect Banner County groundwater supply if all water is pumped from one well.	Sources of water will be obtained in accordance with applicable Nebraska law, which protects current users against adverse impacts from further use. It is highly unlikely that all water would come from a single well since needs vary through time and area in the deployment area. For more information, please refer to Sections 2.6.2.2 and 3.5.4.2 of the Draft and Final Water Resources EPTRs.
1340	Overpumping Cheyenne wellfields to meet drought conditions could lead to increased drawdown, subsidence, and higher pumping costs.	Overpumping would lead to increased drawdowns. If 900 acre-ft per year over the base use of 2,500 acre-ft per year were used the added drawdown should be less than 3 feet. A one year increase of 900 acre-ft would be within the current range of pumping rates, e.g., 1983 pumping will be about 4,500 acre-ft. The amount of drawdown would not significantly increase pumping costs since average pumping head would be increased only slightly. In addition, studies are currently underway to identify alternative pumping patterns that could reduce drawdown. Subsidence is not expected to be a problem. For further information, please see the Draft and Final Water Resources EPTRs, Sections 2.6.4 and 3.5.4.
1341	Drought analysis for water supply analysis was not sufficient.	Additional analyses of drought conditions are included in the FEIS and the Final Water Resources

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		EPTR. It was determined that the 1-in-10 year drought would decrease the Cheyenne Board of Public Utilities yeild from the Crow Creek watershed by about 900 acre-ft in the year of the drought. Drought considerations were included in the water supply analysis since the base period for analysis for Cheyenne (1976-1982) included a drought.
1342	It is difficult to convert gallons per capita per day water demand values to acre-ft/year without knowing the population numbers.	The population values provided in Section 3.1.1 of the DEIS and FEIS were used. One person using 180 gallons per capita per day would use about 0.20 acre-ft/year. The Draft and Final Water Resources EPTR details projection procedures.
1343	Water requirements for the project are difficult to verify based on data provided.	Direct project requirements were based on material quantity estimates of needs for buildings, roads, and other construction. Indirect project requirements are based on population values provided in Section 3.1.1 of the DEIS and FEIS and the per capita rates of usage shown in Section 3.2.1.4 of the DEIS and FEIS. The Draft and Final Water Resources EPTRs detail projection procedures for direct and indirect project requirements.
1344	Use of water from state parks in the Region of Influence could impact the quality of recreation services.	No such use is planned in the deployment area. The potential water level lowerings of Granite Springs and Crystal Lake reservoir to meet demands in Cheyenne are addressed in the Draft and Final Water Resources EPTR in Section 3.5.1. Results show reservoirs can be maintained above desired storage levels of 6,000 acre-ft under baseline and project conditions.
1345	It appears that there is a lack of consistency in estimating future industrial and commercial water use. A 100 acre-ft/year increase is estimated for the Cheyenne urban area, while no increase is estimated for "Other Areas in the Region of Influence."	The reason for assuming that there will be no substantial growth of industrial and commercial water use in "Other Areas of the Region of Influence" is that based on existing land use, there does not appear to be a basis for substantial industrial commercial/land use increases. Because of the increases in water use projected in the Cheyenne area, the additional conservatism introduced by including industrial water use growth was deemed prudent. The higher per capita rates used in other areas (250 gpcd

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		vs. 180 gpcd in Cheyenne) was intended to include such growth.
1346	Investigation into water use and demand reduction measures, such as reuse of treated wastewater effluent for municipal irrigation and other water conservation measures, is encouraged. Such measures would decrease the demand on the Cheyenne water supply system, prevent or moderate the water supply deficits expected during Stage II construction, and prevent the environmental problems that could be associated with the supply augmentation measures mentioned in the draft EIS.	Wastewater reuse is one of the possible mitigations discussed in Section 3.2.1.6 of the DEIS and FEIS and in Section 3.7.1.1 of the Draft and Final Water Resources EPTR.
1347	What will be the impact when demand exceeds supply and how will the Cheyenne Board of Public Utilities meet these demands?	New analysis of population inmigration and project labor requirements for the FEIS has resulted in modified water demand projections. As a result the project-induced shortfall of 190 acre-ft in 1985 is no longer projected. However, demand could exceed supply in any given year, both with or without the project, due to drought conditions. Section 3.7.1 of the Draft and Final Water Resources EPTRs discusses measures that could be used to meet a shortage. The supply figures presented in the documents are based on pumping the nominal amount of 2,500 acre-ft per year from the well fields and not lowering the levels of the Crow Creek Reservoirs. By increasing pumping rates, taking surface water from storage or a combination of the two the Cheyenne Board of Public Utilities could likely meet any anticipated shortages in the near future either with or without the project.
1348	The Draft Water Resources EPTR notes Crow Creek yield of 4,600 acre-ft per year, although records indicate it should be 3,560 acre-ft.	Water losses in the Crow Creek system are allocated to all water sources noted in the DEIS and FEIS, and Draft and Final Water Resources EPTR, while the Board of Public Utilities deducts all losses from Crow Creek inflow. For further information, please see Sections 2.6.1.1.6.1 and 3.5.1.1.1.1 of the Final Water Resources EPTR.
1349	A table should be included in the Final Water Resources EPTR which documents Crow Creek yield to be 3,560 acre-ft per year.	The average yield of Crow Creek is documented to be 4,600 acre-ft per year. For an explanation of the difference in calculation methods used,

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		please refer to Section 3.5.1.1.1.1 of the Final Water Resources EPTR. It should be noted that these differences were discussed with the Director of the Cheyenne Board of Public Utilities, who agrees that methods used in the DEIS and the Draft Water Resources EPTR are reasonable.
1350	Correct text to note expansion of Hog Park Reservoir from 2,970 to 22,650 acre-ft.	Noted. Change has been made in Section 2.6.1.1.6.2 of the final Water Resources EPTR.
1351	The Draft Water Resources EPTR states that the induced demand is 190 acre-ft when the true impact is about 4,000 acre-ft.	The Draft Water Resources EPTR states that the only project-induced shortage (not demand) for the Cheyenne Board of Public Utilities service area is 190 acre-ft in 1985. The total induced demand on the Cheyenne Board of Public Utilities system for the construction period is about 2,400 acre-ft. The 4,000 acre-ft cited in the comment refers to the entire Region of Influence, not the Cheyenne Board of Public Utilites service area. See Section 3.5.1.2 of the Final Water Resources EPTR for additional information.
1352	The Draft Water Resources EPTR states that an accelerated water rate schedule is being phased in over a five-year period. In fact, a uniform rate schedule is being phased in on a three-year schedule.	Corrections are included in Section 3.7.1.1.1 of the Final Water Resources EPTR.
1353	The Draft Water Resources EPTR should show the impact of the project on the Cheyenne Board of Public Utilities wellfields and storage reservoirs.	The FEIS and Final Water Resources EPTR include analysis of impacts on wellfields and storage reservoirs. Project impacts would require increased pumping over baseline conditions of 70 and 80 acre-ft in 1984 and 1991, respectively. These pumping rates could be utilized without reducing storage in reservoirs below desired reserve levels. This is further discussed in Section 3.2.1.4.1.2 of the FEIS, as well as Section 3.5.1.2.2.1 of the Final Water Resources EPTR.
1354	Strong consideration should be given to the potential mitigation measure(s) of implementing the recommendations in the City of Cheyenne wastewater facilities plan.	Early implementation of these measures is discussed in Section 3.2.1.6 of the DEIS and FEIS and Section 3.7.3.3.1 of the Draft and Final Water Resources EPTRs.
1355	Many sources for groundwater quality data were noted to be from older reports (e.g., Rapp et al.	The Water Resource Data System was used as a data source for both surface and groundwater quality

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	1953; Babcock and Bjorklund 1956). It was suggested that the Water Center's Water Resource Data System be used as a data source.	and quantity information. The Water Resources Data System data for groundwater were compared with recent reports (Libra et al. 1981, Ertec 1983), and it was determined that the latter two were sufficiently complete and more useful in establishing long term trends or spatial relationships than were the Water Resources Data System data.
1356	Concern is expressed about the ability of the City of Cheyenne's water supply to meet demand during 1984 and 1985 while Stage II is being built. A shortage could result if these years are dry years of if Cheyenne wellfields production is less than anticipated, even though induced demand is less than 1000 acre-ft. Increased monitoring and modeling of wellfield operations is encouraged as a potential mitigating measure.	Increased modeling and study of Cheyenne's wellfields have been initiated. Please see Section 3.2.1.6 of the FEIS and Section 3.7.5 of the Final Water Resources EPTR for a description of the program.
1357	Existing data for the Cheyenne wellfields are not sufficient to predict site-specific impacts, therefore impacts on existing and potential user cannot be meaningfully assessed. Also, the Cheyenne wellfields are in a designated groundwater control area.	Please refer to the figure in Section 2.6.2.1.1.1 of the Draft and Final Water Resources EPTRs for a delineation of the groundwater control areas in Wyoming. The Cheyenne wellfields are not located in a designated control area. However a data collection and modeling effort has been initiated for the Cheyenne wellfield area. Please refer to the Final Water Resources EPTR, Section 3.5.4.2.1.1 for results and a discussion of this effort. Also, the report prepared for the Air Force by Ertec Western, Inc. (1983) entitled "Project Water Supply Development Plan - Wyoming Deployment Area" presents a further discussion of this effort. The wellfield modeling and study program will continue.
1358	It is assumed that water for construction activities will be from new wells and new wells may be drilled away from the project construction area, yet their locations are not defined at present; therefore, adequate impact assessment cannot be performed.	New wells were assumed as the source of wat - to provide a worst case analysis. The Draft and Final Water Resources EPTRs details the techniques used to determine impacts of new wells or of pumping existing wells. As part of the process to obtain a legal right to use water, the state may require the use of these techniques. As the water acquisition process proceeds the required analyses will be done. Location of any new wells will be more completely defined during this process.

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1359	Predicting site-specific changes in groundwater levels from the data available is not possible. The impact analysis should use site-specific data to predict water level changes.	See Section 3.5.4.2.1.2 of the Draft and Final Water Resources EPTRs for the techniques used to determine impacts of new wells. This is a worst-case analysis and therefore shows the greatest impact. As part of the process to obtain a legal right to use water the state may require the use of these techniques. As the water acquisition process proceeds, required analyses will be done. Location of any new wells will be more completely defined during this process.

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1360	The provision in the DEIS to increase productivity of selected areas of wildlife habitat through promotion of range improvements should be under either the list of assumed mitigations or mitigations to be considered, not both. Also, what the fourth and sixth mitigations on the "list of mitigations to be considered" are meant to mitigate is unclear.	The fourth and sixth mitigation measures have been modified and expanded. The effect of each mitigation measure on the level of impacts, and the timing of each measure have been clarified. The provision to increase productivity of wildlife habitat has been removed from Section 3.2.2.4 and left in Section 3.2.2.6 of the FEIS. For further information, please see Section 3.2.2.6 of the FEIS.
1361	The increase in project-related population will stress game and fish law enforcement capabilites. This problem is not addressed.	An analysis of impacts to game and fish law enforcement was completed and suggests, based on statewide data, that additional help may be needed in Wyoming District 5. A detailed assessment of the impacts of project-related inmigrants on game and fish law enforcement capabilities was presented in the Draft Jurisdictional EPTR. For further information, please see Section 10.0 of the Final Jurisdictional EPTR.
1362	In general, all impact sections within biological resources are too succinct for the reader to determine what the effects will be. The impacts need to be specified more fully in the text.	Where possible, impact analyses were based on quantitative data, however, where such data were not available qualitative elements were used. Analyses presented in the DEIS summarize the major biological categories. More detailed analysis of impacts is presented in Section 3.0 of the Final Biological Resources EPTR.
1363	All unavoidable adverse impacts should be quantified somewhere within the document.	Components of unavoidable adverse impacts, such as permanent losses of riparian habitat, shrubland, and critical habitat of the Colorado butterfly plant, have been quantified, where possible. For further information on unavoidable adverse impacts, please see Section 3.5.1, 3.5.2.6, and 3.8 of the Final Biological Resources EPTR.
1364	Details of mitigation measures, including costs, are not described in the DEIS or Draft Biological Resources EPTR.	Mitigation measures have been described in more detail. However, estimation of implementation costs is beyond the scope of these documents. For further information on details of mitigation measures, please see Section 3.7 of the Final Biological Resources EPTR.
1365	The environmental consequences of direct and indirect unavoidable adverse impacts are not	Impact analyses were based on quantitative data where possible, however, where such data were not

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	quantitatively described.	available, qualitative elements were used. When unavoidable adverse impacts are quantifiable, details are presented within the impact section text. For further information of these details, please see Section 3.5 of the Final Biological Resources EPTR.
1366	Soil erosion problems resulting from road construction and cable laying and their impact upon the biological environment are not addressed.	Impacts of soil erosion on vegetation and wildlife such as increased siltation affecting downstream, and dust deposition affecting downwind vegetation and loss of soil around root systems are expected to cause only minimal impacts. Impacts on fisheries can be found in Section 3.5.3.2 of the Final Biological Resources EPTR.
1367	Experience of biological staff within Wyoming and Nebraska, and Colorado.	Personnel in charge of biological resource studies were selected for their knowledge of the subject, familiarity with the EIS process, managerial skills and experience in the region. Field personnel were selected who were familiar with field techniques and who had a current working knowledge of the Great Plains/Rocky Mountain area, particularly within the Region of Influence. Key technical ecologists/biologists have worked on over 10 environmental projects within the Region of Influence and over 30 within the Great Plains/Rocky Mountain Region. Years of experience in this region of Wyoming, Nebraska, and Colorado averages approximately 15 years for key technical and managment personnel. Other persons with local experise served as consultants for particular tasks or provided data for certain biology tasks.
1368	Proposed disturbances in Wyoming or Nebraska may permanently alter herd movements, raptors' hunting patterns, and waterfowl breeding patterns affecting resident Colorado populations. These effects need to be addressed.	The project is not anticipated to cause disturbances that would alter these wildlife movements or behavior patterns in Colorado. These types of impacts are expected to cause only negligible to low impacts to these wildlife groups in Wyoming and Nebraska. For further information on impacts to big game, raptors, and waterfowl in Colorado, please see Section 3.5.2.1, 3.5.2.5, and 3.5.2.6 of either the Draft or Final Biological Resources EPTR.
1369	Poaching, dog kills, highway mortality, and hunting pressures are likely in Colorado, but are	Impacts to game in Colorado from poaching, dog kills, highway mortality, and increased hunting

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	not addressed.	pressure are anticipated to range from low to negligible for these activities. The low impacts would be significant. For further information, please see Section 3.5.2.1 of either the Draft or Final Biological Resources EPTR.
1370	Effects of the project on Colorado big game, nongame, furbearers, upland game, waterfowl, raptors, fisheries, and threatened and endangered species should be addressed in the DEIS.	Impacts to these wildlife species in Colorado are primarily indirect effects, and may range from negligible to moderate levels. Some of these impacts would be significant. For further information, please see Section 3.5.2 of the Draft or Final Biological Resources EPTR.
1371	Alterations in north-south drainages in the study area may affect Colorado fisheries, some of which include state-listed threatened fish species. These potential effects are not discussed.	Impacts to fishes, as summarized in the DEIS, include the effects on Colorado fisheries. A more detailed discussion of the project-related impacts to the fisheries, including those in Colorado, was presented in the Draft Biological Resources EPTR. For further information, please see Sections 2.6.3, 2.6.5.3, 3.5.3, and 3.5.5.3 of either the Draft or Final Biological Resources EPTR.
1372	Aspects regarding restoration of vegetation following construction are not discussed thoroughly enough.	Impact analysis related to recovery and restoration of vegetation is based on the implementation of the appropriate assumed mitigations and the evaluation of potential recovery rates of various vegetation types. Potential recovery rates are based on discussions with state and federal agency personnel, experience with environmental analyses in Wyoming and Colorado, and review of literature relative to recovery rates of vegetation along disturbed corridors. Please refer to Section 3.2.2.4 of the FEIS and Section 3.2.2 of the Final Biological Resources EPTR.
1373	Long and short-term impacts of soil erosion on vegetation are not identified.	Impacts of soil erosion on vegetation include increased siltation affecting downstream vegetation, dust deposition downwind, and loss of of soil around root systems. The duration of the effects of these impacts will depend upon the vegetation type affected.
1374	The recovery period of riparian vegetation following disturbance is not identified.	Recovery of riparian vegetation may be expected to vary depending on the composition of the

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		vegetation. If trees and shrubs are present the recovery rate will be slower than if only grasses and forbs were present. The recovery period is identified as being greater than five years. For further information, please refer to Section 3.5.1.2 of the Final Biological Resources EPTR.
1375	Data are insufficient to conclude that impacts at cable paths, roads and staging areas (dispatch stations) will be negligible.	Impacts to vegetation at cable paths, roads, and staging areas depend upon the vegetation types present. Impacts at these areas are not all negligible but vary from negligible to moderate. Although precise locations of dispatch stations were not known during EIS and EPTR preparation, it is anticipated that these areas will be located in or near urban areas, with grassland or disturbed habitat affected. For details concerning these impacts, please refer to Section 3.2.2.4.1 of the Final Biological Resources EPTR.
1376	Vegetation impact sections do not address impact controls for cable system crossings of streams or riparian areas. Additional standard impact control measures should be considered: a. Timing stream crossings to avoid periods of high flows; b. Minimizing disturbances to streambeds, wetlands, and riparian zones through the restricted use of machinery; c. Locating field staging areas away from stream channels and riparian zones; d. Stabilizing streambanks as quickly as possible after disturbance; and e. In trout spawning areas, stream crossings should be timed to avoid the period of spawning.	Several mitigation measures are presented in order to minimize project impacts to streams and riparian areas. These measures relate to points b, c, and e of the issue text. Measures a and d are considered normal construction practices, which are assumed to be followed during the course of project construction. For further information, please see Sections 3.2.2 and 3.7 of the Final Biological Resources EPTR.
1377	Animals other than raptors are subject to indiscriminate shooting. However, this is not addressed in the document.	More detail has been added concerning impacts of indiscriminate shooting on wildlife. Although significant impacts may occur to big game and raptors from indiscriminate shooting, impacts on nongame mammals, reptiles and amphibians, and other birds will be negligible. For further information, please see Section 3.5.2 of the Final Biological Resources EPTR.
1378	There is no indication whether recreation impacts on wildlife will be more severe on public land	Although recreation impacts to wildlife will occur on both public and private lands, impacts are

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	than on private land.	anticipated to be greater on public lands due to access constraints on private lands. Many private landowners deny or restrict access to their land by hunters, fishermen, and other recreationists. Therefore, it is expected that public lands within the Region of Influence will experience the greatest impact from increased recreational activity. Please refer to Section 3.5.2 of the Final Land Use EPTR for information concerning project impacts on recreational resources.
1379	It should be noted in the wildlife sections that the swift fox is considered by the Wyoming Game and Fish Department to be a species of high biological priority in Wyoming.	Reference has been made to the status of the swift fox in Wyoming. For further information, please see Section 2.6.5.2.1 of the Final Biological Resources EPTR.
1380	The nongame mammals section of the existing conditions should include the number, areal extent and locations of prairie dog towns likely to be affected by the project.	The Area of Concentrated Study has been surveyed for prairie dog towns that may potentially be affected by the project. These prairie dog towns have also been surveyed for sign of black-footed ferret. The number, size range, and location of prairie dog towns that may be affected by the project are presented in Section 2.6.5.2.2.1 of the Final Biological Resources EPTR.
1381	Lambing, fawning, and calving grounds for big game do occur in the north central portion of Laramie County.	Lambing, fawning, and calving grounds include only those areas designated by the Wyoming Game and Fish Department. For further information, please refer to Section 2.2.2.2.4.2 and Appendix B of the FEIS.
1382	More quantitative analyses should be performed in the assessment of disturbance to raptors nesting within one mile of access roads or silos.	More detailed quantitative assessement of impacts to raptors is not possible due to a variety of factors such as timing of construction, availability of alternative nesting habitat, and whether presently inactive nests will become active in subsequent years.
1383	Impacts of soil erosion on wildlife habitat are not identified.	Since project-generated soil erosion is anticipated to have negligible impacts on vegetation, erosion impacts on wildlife habitat were also considered to be negligible.
1384	The length of time required for the recovery of wildlife populations is not presented. The data	Recovery periods for wildlife species vary considerably depending on their reproductive

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	which justify impact levels to wildlife species are not identified.	potential and longevity. However, for purposes of impact evaluation, recovery periods were divided into short and long-term. The criteria for these categories and the data used for determining impact levels are both described in the impact evaluation model discussion. For further information, please see Sections 3.1 and 3.5.2 in the Final Biological Resources EPTR.
1385	The basis for impact levels in the Region of Influence on furbearers, upland game, waterfowl, nongame mammals, birds, reptiles, and amphibians is not identified.	Impact levels for this group of species were developed through the use of an impact evaluation model. Please refer to Sections 3.1 and 3.5.2 of the Final Biological Resources EPTR for a discussion of the use of the model, and additional detail concerning justification for impact levels for these wildlife species.
1386	The reason for the difference between long and short-term impact levels on big game species in the Region of Influence is not stated.	Impact levels for this group of species were developed through the use of an impact evaluation model. Please refer to Sections 3.1 and 3.5.2 of the Final Biological Resources EPTR for a discussion of the use of the model, and additional detail concerning justification of impact levels for these wildlife species.
1387	The basis for the difference between long and short-term impact levels on raptors in the Region of Influence is not stated.	Impact levels for raptors were developed through the use of an impact assessment model. Please refer to Sections 3.1 and 3.5.2 of the Final Biological Resources EPTR for a discussion of the use of the model, and additional detail concerning justification of impact levels for these wildlife species.
1388	Potential adverse consequences for the Greater Prairie Chicken in Colorado are not addressed.	The Greater Prairie Chicken was reviewed for potential project-related impacts. A determination was made that the project would not affect this species. For further information, please see Sections 2.6.5.2 and 3.5.5.2 of the Draft or Final Biological Resources EPTR.
1389	Construction activity should be scheduled to minimize disturbance to raptor nests.	Mitigation measures for reducing impact levels to nesting raptors have been modified. The period of March-July has been added to the potential mitigation measure related to scheduling of construction activity. Please see Section 3.2.2.6

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		of the FEIS for the modified version of this mitigation measure.
1390	Fisheries resources should address the locations of major lakes, rivers, and streams: which ones contain important biological resources, and where and what those resources are.	A summary of fisheries resources, including location and species composition of important fisheries within the Region of Influence and Area of Concentrated Study is presented in Section 2.2.2.2.3.3 of the FEIS. The detailed information is available in Section 2.6.3.3 of the Final Biological Resources EPTR.
1391	Important fisheries and their distances from Cheyenne should be described in more detail. Fisheries that are of significant local importance such as the beaver ponds in the Pole Mountain area should be mentioned.	Those fisheries considered to be important based on agency concerns and literature review and because of quality and accessibility, are included in the Region of Influence. Potential use of important fisheries is included in estimates of recreation use levels in Section 10.1 of the Final Jurisdictional EPTR. Fisheries potentially used by project inmigrants range from those within the City of Cheyenne to those nearly 150 miles away such as Seminoe and Alcova Reservoirs.
1392	The degree of projected increase in fishing pressure in the Region of Influence and where this effect will be noticed are unclear.	Analyses of fisheries resources in the DEIS summarize impacts to fisheries including fishing pressure. Details concerning the degree of projected increase in fishing pressure and specific locations where this effect will be noticed are presented in Section 3.5.3.2 of the Final Biological Resources EPTR.
1393	The DEIS does not quantitatively address what petroleum products and chemicals can be expected to be discharged into drainages in the event of accidental spills.	The analysis was based on the potential accidental spills of such vehicle associated petroleum products as motor oil, gasoline, and diesel fuel. These discharges are not presented in numerical terms because they cannot be quantified. For information on anticipated impact levels, please see Section 3.5.3.2 of the Final Biological Resources EPTR.
1394	The projected turbidity and water quality changes due to sand and gravel removal have not been quantified.	The projected turbidity and water quality changes from sand and gravel removal cannot be quantified due to a variety of variables, including the location of aggregate quarries used for the project, the areal extent of disturbance at each pit, and the duration of project activity at each

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		quarry site.
1395	The probability of significant short-term impacts discussed in DEIS, Sections 3.2.2.4.4 and 3.2.2.4.5 causing permanent impairment is not addressed. The length of recovery of fisheries resources is not discussed.	Impacts listed as short-term are not expected to cause permanent or long-term impacts. These impacts and the length of recovery for fisheries resources are only summarized in the FEIS. For details on impacts and recovery periods, please see Sections 3.1 and 3.5.3.2 of the Final Biological Resources EPTR.
1396	Short and long-term soil erosion impacts on fisheries are not identified.	Short-term soil erosion would be related to bridge and culvert upgrading and communication cable installation. Expanded discussions of impacts to fisheries were presented in the Draft Biological Resources EPTR. For further information on potential impacts to fisheries, please see Section 3.5.3.2 of the Final Biological Resources EPTR.
1397	The fish species which spawn in the impacted creeks are not identified.	While some potential salmonoid spawning areas have been noted in the deployment area, confirmation of their activity will be based on the results of continuing field studies to be carried out as part of the assumed mitigations. Discussion of species composition in deployment area creeks are presented in Section 2.6.3 of the Final Biological Resources EPTR.
1398	The reproductive cycle for threatened and endangered fish species, such as the greenback cutthroat trout, are not discussed in the DEIS, Sections 3.2.2.4.4 and 3.2.2.4.5.	Since the range of the greenback cutthroat trout extends only into the periphery of the Region of Influence, reproductive cycle information is immaterial to the analysis of impacts. This is the only federal-listed endangered fish species within the Region of Influence.
1399	Disturbance of riparian vegetation will impact stream characteristics including fish habitat.	Disturbances to riparian vegetation may affect stream quality and temperature. However, since the quantity of riparian habitat expected to be disturbed is low, the effects on fisheries will be localized and negligible.
1400	Explanation of how borrow pits in perennial streams are going to improve fishing opportunities is not handled with enough detail. Also, parties responsible for designing and managing these areas should be mentioned.	Permitting agencies and quarry pit operators will be responsible for designing and managing these areas for enhancement of fishing opportunities, utilizing the best available technology.

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1401	Specific measures to prevent turbidity and water quality changes should be identified, as well as specific measures that would be taken should these changes take place.	Specific measures for minimizing impacts on aquatics, such as restricting activity in the flood plain, discharging water from excavations via settlement basins, and performing construction during low flow are considered to be included as good engineering and construction practices. Mitigation measures not considered to be normal construction practices have been modified and expanded. Please see Section 3.2.2.4 of the FEIS for these changes in mitigation measures.
1402	Impacts on biological resources are worthy of more detailed analysis.	Impact analyses were based on quantitative data where possible, however, where such data were not available, qualitative elements were used. Detailed analyses of project impacts are presented in Section 3.0 of the Final Biological Resources EPTR.
1403	All the listed potential biological mitigation measures should be committed to.	Under the Memorandum of Agreement among the Secretary of Defense and the governors of Wyoming and Nebraska, a working group is reviewing mitigation measures for inclusion in detailed mitigation plans and programs under development.
1404	The impact of deployment on biological resources is not fully disclosed.	Impact analyses were based on quantitative data where possible, however, where such data were not available, qualitative elements were used. Detailed analyses of project impacts are presented in Section 3.0 of the Final Biological Resources EPTR.
1405	The biological resources section does not comply with the Federal Conservation Statutes.	The construction and operation of the Peacekeeper project will proceed in compliance with all applicable federal and state environmental laws.
1406	The Migratory Bird Treaty Act is apparently violated, because there is no suggestion that a permit has been sought from Department of the Interior.	The U.S. Fish and Wildlife Service has indicated to the Air Force that no migratory bird permit is required for the Peacekeeper project. Consultation is ongoing regarding efforts to minimize any incidental takings of migratory birds.
1407	The lack of sufficient on-the-ground inventories of sensitive plant species and critical wildlife	Helicopter flights and ground surveys supplementing the literature were conducted both

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	habitat in combination with an inadequate literature review results in the violation of conservation statutes.	before and following publication of the DEIS. Timing and results of these surveys can be found in Section 2.6 of the Final Biological Resources EPTR. In addition, a biological assessment has been prepared for the U.S. Fish and Wildlife Service to satisfy the requirements of Section 7(c) of the Endangered Species Act. Therefore, the environmental impact analysis process was in compliance with conservation statutes.
1408	Extensive secondary sources were consulted for biological impacts in Wyoming and Colorado, but not for Nebraska.	Differences in the number of cited references between those for Wyoming and Colorado, and those for Nebraska directly reflect a discrepancy in the published literature. More citations appear for Wyoming and Colorado because more pertinent literature was available. References for Nebraska were sought out with the same diligence as for Wyoming and Colorado but fewer sources were located.
1409	Specific details of primary data sources such as helicopter flights and field surveys, including timing, total hours involved, and hours spent in Nebraska, were not provided in the DEIS.	Helicopter surveys included vegetation analysis, big game observations, prairie dog town surveys, and stream surveys. Field surveys included vegetation transects, small mammal trapping, big game observations, aquatic sampling, day and night black-footed ferret surveys, and bird transects. These surveys were conducted in those areas of the Area of Concentrated Study where project impacts are anticipated, including silos, access roads, portions of F.E. Warren AFB, and communication cable pathways. For further information, please see Section 2.6 of the Final Biological Resources EPTR. Approximately 120 man-hours of helicopter time, 1,100 man-hours of field time, and 310 man-hours of law enforcement data collection time were spent in Wyoming and Nebraska during June, July, October, and November 1983 during biological surveys. Of these hours approximately 50 man-hours of helicopter time, 220 man-hours of field time, and 90 hours of law enforcement data collection were spent in Nebraska.
1410	Existing and future population characteristics of biological resources are not adequately	The level of quantification of population characteristics used in the DEIS was determined

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	quantified.	to be adequate following discussions with state and federal resource management agency biologists. Projections of future species' population levels are very difficult to make with reasonable accuracy because of the many different variables interacting upon a species. Therefore, the usefulness of these population projections would be questionable because of their large inherent inaccuracy. Big game population status and management goals are delineated in Section 2.2 of the Final Biological Resources EPTR.
1411	Qualifications (strengths and weaknesses) of the impact assessment model and alternative models should be discussed.	The model is based on the structured logic, but not the mathematics, used in decision analysis and decision theory. The model has been successfully applied to the biological impact analysis for a major project that traversed a complex mosaic of vegetation types and wildlife habitats. The document prepared using the methodology was a joint EIS/EIR prepared with BLM and the California Public Utilities Commission as co-lead agencies. The model was also used as the basis for biological impact analyses for an EIS (BLM as lead agency) for a major pipeline running from Wyoming to Texas. The model is designed to be suitable for a project of any magnitude, located in any area of the United States. The model was selected for use on this project because, in the opinion of the biological team, it provided a comprehensive framework for structuring the impact analyses. More detail on the characteristics and use of the impact evaluation model are presented in Section 3.1 of the Final Biological Resources EPTR.
1412	Sources which will perform assumed and suggested mitigations should be identified. Mitigation measures which were considered but eliminated should be identified.	The agency responsible for implementing mitigation measures has been indicated in the description of these measures. It is not within the scope of either the EIS or Biological EPTR to include eliminated mitigation measures, since their presence in the report would not be useful in efforts to reduce the level of project impacts. efforts to reduce the level of project impacts. For further information, please see Sections 3.2.2.6 of the FEIS, and Sections 3.2.2 and 3.7

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		of the Final Biological Resources EPTR.
1413	Under the No Action Alternative, current trends in human-related impacts and possible changes in management philosophies are not identified. Conditions of the resources based upon the No Action Alternative should be projected to 1990.	Changes in management philosophies and trend projections cannot be identified due to numerous variables such as unknown future projects, environmental conditions (e.g., droughts) that may affect biological populations, and changing human perceptions of the importance of different species. Current trends in human-related impacts can be found in the Human Resources section of the FEIS and their associated EPTRs.
1414	Impact aggregation methodology employed, including sources, is not adequately discussed in the DEIS or Biological Resources EPTR.	The aggregation was based on an evaluation of the impact levels derived for each resource component (subelement or element). The highest resource subelement impact level was selected as representative of the resource's element impact level. The highest impact level among the resource elements was selected as representative of the impact level for the resource as a whole.
1415	Secondary data sources for Nebraska are inadequate because state agencies such as Nebraska Department of Environmental Control and Nebraska Natural Resources Commission and university research files were not consulted and public interest or conservation groups were not contacted. Additionally, the 1972 Nebraska Wildlife Inventory is outdated. Ground truth surveying should be performed to update the existing literature.	Nebraska state agency and university files that were found to be relevant to the document were used and cited. Additional cited references may be found in Section 5.0 of the Final Biological Resources EPTR. Since publication of the DEIS, additional Nebraska conservation groups were contacted for data and concerns. Ground truth reconnaissance surveys were conducted during the summer and fall of 1983. For further information, please refer to the Final Biological Resources EPTR.
1416	Impacts on streams of western Nebraska due to construction activity are difficult to estimate because comprehensive biological surveys are not available for these streams.	Those streams expected to receive project-related impacts in Nebraska were surveyed by helicopter, and found to be intermittent. For additional information concerning streams in the Nebraska portion of the Area of Concentrated Study, please refer to Section 2.6.3.1.2 of the Final Biological Resources EPTR.
1417	Additional vegetation data for Banner County, Nebraska and for the Scotts Bluff and Agate Fossil Beds National Monuments will be available upon the	Noted.

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	successful conclusion of these studies.	
1418	The threatened and endangered species section should include discussion of species that would become threatened or endangered due to nuclear risk.	Please see Section 1.3.3 of the FEIS.
1419	The potential impacts to the Colorado butterfly plant stated in the text suggest that the plant may not be adequately protected. Despite mitigation measures mentioned, critical habitat will suffer irreparable damage. A specific management plan is needed for both the Colorado butterfly plant and woolly milkvetch.	A biological assessment has been prepared and a biological study plan is in preparation which thoroughly address impacts and mitigation measures for the Colorado butterfly plant. No management plan is required for the woolly milkvetch because it does not have any legal status. However, additions to the population that have been located during field studies are described in Section 2.6.5.1 of the Final Biological Resources EPTR.
1420	All road alternatives on F.E. Warren AFB will adversely affect the habitat of the Colorado butterfly plant violating the Endangered Species Act and Memorandum of Understanding between the U.S. Air Force and U.S. Fish and Wildlife Service. Alternatives that avoid these impacts should be selected.	Road alternatives on F.E. Warren AFB have been modified to minimize impacts on the Colorado butterfly plant. In addition, a Biological Assessment in Compliance with Section 7 of the Endangered Species Act has been finalized. The results of the Biological Assessment in conjunction with associated activities and results of the Biological Study Plan, will provide additional guidelines for the protection of the F.E. Warren AFB population of the Colorado butterfly plant.
1421	The unavoidable adverse impacts to the Colorado butterfly plant violate the Endangered Species Act. Alternatives avoiding these impacts should be developed or an exemption must be obtained under the provisions of the Act.	Road alternatives on F.E. Warren AFB have been modified to minimize project impacts to the Colorado butterfly plant. A Biological Assessment, in compliance with Section 7 of the Endangered Species Act, has been completed and a Biological Study Plan for the Colorado butterfly plant is in preparation. The results of the Biological Assessment in conjunction with associated activities and results of the Biological Study Plan, will provide additional guidelines for the protection of the F.E. Warren AFB population of the Colorado butterfly plant.
1422	The DEIS gives no indication that previous impacts to the Colorado butterfly plant will not be	A Biological Assessment in compliance with Section 7 of the Endangered Species Act has

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	repeated, given the lack of sufficient inventory of biological resources and monitoring of construction activities.	been completed. The results of this assessment in conjunction with associated activities and results of the Biological Study Plan, will provide additional guidelines for the protection of the F.E. Warren AFB population of the Colorado butterfly plant.
1423	The Colorado butterfly plant as an issue to denote concern for the lack of hearings in Colorado.	Noted.
1424	Impacts on humans are far more important than impacts on endangered species such as the woolly milkvetch.	Noted.
1425	Proposed north-south transportation and utility corridors should be relocated as mitigation measures for the Colorado butterfly plant.	Proposed road alternatives for F.E. Warren AFB have been modified since publication of the DEIS. These changes along with modified and expanded mitigation measures will reduce impacts to the Colorado butterfly plant. For further information on these changes, please see Sections 1.0 and 3.5.5 of the Final Biological Resources EPTR. In addition, a biological assessment has been completed in compliance with Section 7(c) of the Endangered Species Act and a Biological Study Plan for the Colorado butterfly plant is in preparation.
1426	Endangered species used as a metaphor to help put the danger of the missile system on humans in perspective.	Noted.
1427	Impacts and mitigations relative to the swift fox on F.E. Warren AFB are not addressed.	Section 3.2.2.4.5.2 of the DEIS discusses potential impact to the swift fox. The range of the swift fox includes F.E. Warren AFB. Though no actual siting has been made at F.E. Warren AFB, sitings have occurred within one to two miles of the base. For further information, please see Sections 3.2.2.4 and 3.2.2.6 of the FEIS for mitigation measures applicable to wildlife species.
1428	Where bald eagles occur in the Region of Influence is more important than what kind of habitat they frequent.	Known bald eagle eyries and areas frequented by wintering bald eagles within the Region of Influence have been plotted. Additionally, results of the 1983 bald eagle winter survey are discussed

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		in the EPTR. For further information, please refer to Section 2.6.2.6 of the Final Biological Resources EPTR.
1429	Additional discussion is required in addressing construction-related mortality to wildlife species, including the pale milk snake.	If the pale milk snake occurs within a facility area to be disturbed and gets trapped in a small mammal burrow it may become a construction mortality. Individuals of this species and other wildlife species may be lost if they get trapped underground during grading operations. However, most will be able to move out of the way of construction activity as can the larger wildlife species. For further information on impact levels, please see Section 3.5.2 and 3.5.5 of the Final Biological Resource EPTR.
1430	Fieldwork needs to be done to determine presence or absence of the black-footed ferret within the project area.	As required by Section 7 of the Endangered Species Act, a Biological Assessment has been prepared for the U.S. Fish and Wildlife Service which addresses in detail the project impacts on threatened and endangered species. As part of the data gathering process for this project, helicopter and field surveys were conducted to locate prairie dog towns. Those towns potentially impacted by project activities were then surveyed in detail according to U.S. Fish and Wildlife Service techniques for any sign of black-footed ferrets. This included both day and nighttime surveys.
1431	Nebraska's Threatened and Endangered Species Act is as strong as the Federal Endangered Species Act.	Noted.
1432	The three road alternatives on F.E. Warren AFB appear to violate the Endangered Species Act due to impacts on critical habitat of the Colorado butterfly plant.	Since the publication of the DEIS, road alternatives on F.E. Warren AFB have been modified to further minimize project impacts to the Colorado butterfly plant. A Biological Assessment in compliance with Section 7 of The Endangered Species Act has been prepared. The results of the Biological Assessment in conjunction with associated activities and results of the Biological Study Plan, will provide additional guidelines for the protection of the F.E. Warren AFB population of the Colorado butterfly plant.

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1433	Plant species required to be addressed for impacts and steps being taken to meet requirements of the Endangered Species Act need to be discussed.	Based on the U.S. Fish and Wildlife Service compliance list for the Endangered Species Act, the Colorado butterfly plant was the only plant species that had to be addressed for impacts. Detailed analyses of impacts to the Colorado butterfly plant and mitigation measures have been included in the Section 7 Biological Assessment produced since the publication of the DEIS. The assessment specified steps to meet requirements of the Endangered Species Act.
1434	Sources for threatened and endangered species analysis are not adequately identified. Specifics of helicopter flights and field surveys, including the number of participants involved and their qualifications, are not included in the DEIS.	A Biological Assessment has been prepared for the U.S. Fish and Wildlife Service to satisfy the requirements of Section 7 of the Endangered Species Act. Helicopter surveys were conducted in June, August, and October of 1983 which included big game observations, vegetation reconnaissance, stream surveys, and prairie dog town surveys. Please refer to Sections 2.6.5.2.2.1, 2.6.3.2.2.1 and 2.6.5.2.2.1 of the Final Biological Resources EPTR for discussion of the timing of, and significant data acquired during, aerial surveys. Helicopter overflight and field reconnaissance surveys were conducted by qualified biologists. Refer to Section 6.0 of the Final Biological Resources EPTR for information regarding the participants. Please refer to Section 2.6.5 and Section 5.0 of the Final Biological Resources EPTR for details concerning sources of data relative to threatened and endangered species.
1435	The FEIS should document the results of the Section 7 consultation, provide a listing of the species and a summary of probable project impacts to these species.	Results of the Section 7 consultation cannot be included in the FEIS or Final Biological Resources EPTR due to publication schedules. The consultation process could not be completed prior to publication of the FEIS and Final EPTR. However, the majority of the discussion of species in the Biological Assessment is also in the FEIS and Final Biological Resources EPTR.
1436	Mitigation measures that ensure against the destruction or adverse modification of critical habitat of threatened and endangered species are	Since the publication of the DEIS, detailed analyses of impacts to the Colorado butterfly plant and mitigation measures have been performed

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	not addressed.	to further minimize disturbance to the plant. Section 3.2.2.4 of the FEIS and Section 3.2.2 of the Final Biological Resources EPTR also present assumed mitigations that reduce or eliminate impacts on critical habitat.
1437	The Threatened and Endangered Species Act requires that a biological assessment be performed because there is no wildlife inventory for Nebraska. This assessment is not addressed.	Since publication of the DEIS, a Biological Assessment has been prepared for the U.S. Fish and Wildlife Service as required for compliance with Section 7(c) of the Endangered Species Act.
1438	Monitoring effects of the cone of depression associated with increased groundwater use does not address the loss of Colorado butterfly plant habitat because it assumes the roads will be built. Also, no action is proposed if the water monitoring does show a decrease.	The cone of depression associated with groundwater use is independent of road construction because it refers to the increased draw of water from the Cheyenne wellfield. The minimal drawdown of the Cheyenne wellfield will not reach F.E. Warren AFB, and therefore no impacts to the Colorado butterfly plant are anticipated. Please see the Final Water Resources EPTR for details concerning the potential effects of the project on water resources.
1439	Species such as the Colorado butterfly plant have priority protection under the Endangered Species Act. The Act would be violated if new roads are placed through the habitat and some unknown parameter changes causing the decline or extinction of this species. This possibility is not addressed.	Road alternatives on F.E. Warren AFB have been modified to further minimize impacts on the Colorado butterfly plant and detailed analyses of impacts and mitigation measures have been performed. In addition, a Biological Assessment, in compliance with Section 7(c) of the Endangered Species Act, has been prepared. The results of the Biological Assessment in conjunction with associated activities and results of the Biological Study Plan, will provide additional guidelines for the protection of the F.E. Warren AFB population of the Colorado butterfly plant. For further information, please see Section 3.5.1 of the Final Biological Resources EPTR.
1440	Specific mitigation, recovery, and monitoring programs for the Colorado butterfly plant should be included for those road alternatives that impact the plant's habitat. These programs should include studies of habitat parameters, transplantation, propagation, and cultivation.	A Biological Assessment in compliance with Section 7(c) of the Endangered Species Act has been prepared and a detailed Biological Study Plan is in preparation. Road alignments have been redesigned since the publication of the DEIS as mitigation to lessen the impacts to critical habitat of the Colorado butterfly plant. Please see Sections 1.0, 2.6.5.1, and 3.5.5.1 of the

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		Final Biological Resources EPTR for details of these changes.
1441	Although significant long-term impacts on endangered wildlife and plant species in the area may occur, mitigation does exist which can lead to acceptable accomodations.	Noted.
1442	Due to the number of both plant and animal threatened and endangered species involved and the fact that there are known or distinct possibilities of impact and/or destruction, there is an explicit need for further analysis and consideration of mitigation for affected species, both in the project area and further downstream.	Impact to threatened and endangered species were analyzed in detail and mitigation measures examined. As a result of this process, road alternatives on F.E. Warren AFB have been modified to minimize impacts to the Colorado butterfly plant. As requried by Section of the Endangered Species Act a Biological Assessment has been prepared. Surveys for black-footed ferrets have been initialed. Impact to other species have also been minimized. For further information on impacts to these species, please see Sections 3.2.2.4.5 of the FEIS and Section 3.5.5 of the Final Biological Resources EPTR.
1443	The DEIS does not comply with Nebraska State conservation laws.	During the construction and operation of the Peacekeepeer missile system, all actions will proceed in compliance with all applicable federal and state environmental laws.
1444	The DEIS does not specify how the Air Force intends to comply with the requirements of a number of Federal conservation statutes. The DEIS does not show that required consultations have been performed. These consultations must be performed and the information and expert analysis of those consulting agencies must be included in the DEIS, in order for it to stand as an adequate decisionmaking document.	The Air Force will comply with all applicable Federal conservation statutes. Such compliance and the consultation required thereby are integral parts of the overall Environmental Impact Analysis Process of the Air Force.
1445	All the potential biological mitigation measures listed should be committed to.	Mitigations listed in the FEIS represent a menu of potential measures for consideration. For further information, please see Section 1.7 of the FEIS.
1446	Increased wildlife law enforcement personnel may be needed.	An analysis of impacts to game and fish enforcement was completed and suggests, based on statewide data, that additional help may be needed

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		in Wyoming District 5. For revised information on wildlife enforcement needs, please see Section 10.0 of the Final Jurisdictional EPTR.
1447	Aggregate quarries located in or adjacent to streambeds may cause severe and prolonged erosion and sedimentation problems. These quarries would have to be reviewed on a case-by-case basis to determine impacts, acceptability, and mitigation measures. As a rule, it is best to locate quarries outside of floodplains.	Noted.
1448	Details relative to the primary data source, such as the number of hours spent conducting helicopter and field surveys in Nebraska, and the timing of these surveys are not disclosed.	Approximately 50 man-hours of helicopter time, 220 hours of field time, and 90 hours of law enforcement data collection time were spent in Nebraska during June, July, October, and November 1983 during biological surveys. Helicopter surveys included vegetation mapping, big game observations, prairie dog town surveys, and stream surveys. Field surveys included vegetation transects, small mammal trappings, acquatic sampling, black-footed ferret surveys, and bird transects. These surveys were conducted in those areas of the Area of Concentrated Study where project impacts are anticipated, including silos, access roads, portions of F.E. Warren AFB, and communication cable corridors. Some additional details are included in Section 2.6 of the Final Biological Resources EPTR.
1449	Off-road vehicle travel is not addressed.	Impacts to short-grass prairie, meadows, shrub-land, woodland, and riparian vegetation due to off-road vehicle use was addressed in Section 3.2.2.4.1 of the DEIS, and in the Draft Biological Resources EPTR. For further information, please see Section 3.2.2.4.1 of the FEIS and Section 3.5.1.2 of the Final Biological Resources EPTR.
1450	There was no discussion of trespassing and other damages to private landowners as a result of the presence of hunters and fishermen.	Trespassing was shown as a category of fish and game violations in Table 10.2.1-1 of the Draft Jurisdictional EPTR. Vandalism and other damages are not included. For further information, please see Section 10.4 of the Final Jurisdictional EPTR.
1451	Analysis methods used for fish and game law enforcement data differed from Wyoming's state	The analysis for the Draft Jurisdictional EPTR was based on district and county violations and

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	analysis, which was based on statewide yearly violations and population increases.	increases or decreases in population, not on statewide totals. In the Final Jurisdictional EPTR statewide data were analyzed and the results indicate there is a correlation between population increases and fish and game violations on a statewide basis. The analysis methods are reviewed in Section 10.0 of the Final Jurisdictional EPTR.
1452	Wyoming Game and Fish Department disagrees with the conclusion that no increase in the level of fish and game law enforcement is warranted.	The analysis was based on Game and Fish Department data; however it was reanalyzed, with additional data recently collected. Please refer to Section 10.3 of the Final Jurisdictional EPTR.
1453	Additional documentation is needed to justify the conclusion of no increase in fish and game law enforcement.	Analysis of available data shows no correlation between changes in population and changes in violation at the county level. However, analysis on a statewide basis indicates a correlation does exist. For further information, please see Section 10.3 of the Final Jurisdictional EPTR.
1454	The fish and game violation data should be viewed as not disproving a relationship between increased population and increased violations. Impacts on game warden resources should be more closely addressed.	Data were not analyzed to disprove a relationship between population change and increases in wildlife violations. Data were analyzed to identify the correlation between changes in population and violations, and what the correlation may be. Identification of this correlation allows a prediction of violations associated with project inmigrants and potential impacts that wildlife law enforcement personnel may have to deal with in relation to the proposed project. Please refer to Section 10.0 of the Final Jurisdictional EPTR.
1455	Experience from the Overthrust Belt shows a direct relationship between population growth and fish and game violations increase.	Analysis of statewide game and fish violations indicates a correlation between population increases and violations. It has been assumed district trends are reflective of statewide trends. Please refer to Section 10.3 of the Final Jurisdictional EPTR.

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1456	Impacts on geologic conditions in the DEIS are worthy of more detailed analysis.	The DEIS presents a summary of the geologic conditions in the deployment area. Detailed explanations and analyses are presented in the Geologic Resources ETPR. For further information, please see Sections 2.6.1 and 2.6.2 of the Final Geologic Resources EPTR.
1457	What project restrictions might be imposed on mineral and petroleum exploration and exploitation?	In general, the project will result in no additional restrictions on mineral and petroleum exploration and exploitation. For exploration and development within the Quanity Distance around the silos and along the cable routes, mineral rights holders will have to comply with existing Air Force notification and other easement requirements.
1458	Certain state and federal land use regulations require a specific time be named for the protection of soil resources. Please clarify this issue.	Presently there is no precise construction schedule on which to base a time schedule for revegetation. However, the Air Force has committed to comply with all pertinent state and federal regulations regarding revegetation of disturbed lands.
1459	Need for SCS soil surveys in the project areas, including support areas and areas of housing and industrial expansion.	General soil conditions have been reported and analyzed along the potential cable routes and at F.E. Warren AFB where the majority of any new support area construction will take place. These analyses have concentrated on worst case conditions at the construction areas. The analyses on F.E. Warren AFB are based on an available SCS Order 2 soil survey. Subdivision plat reviews are presently part of the duties performed by the local SCS. This service should continue to be adequate to survey any new housing expansion related to the project. Order 3 soil surveys are available for the area around Cheyenne.
1460	Revegetation of disturbed areas is often less than successful. Erosion will be a more sizeable problem than predicted in the DEIS.	The soil erosion analyses presented in the DEIS are generalized, worst-case examples from large areas of potential ground disturbance from construction. In all likelihood, there will be specific, localized areas with much less severe soil erosion problems than predicted. Also likely, is the potential of having specific, localized

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		areas with more severe soil erosion problems. Therefore, as presented, the soil erosion analyses in the FEIS are adequate to report overall project impacts.
1461	Discuss the long-term impact of maintenance and security issues upon mineral exploration, soil compaction and sod disturbance, and erosion.	Maintenance and security activities are not expected to have long-term impacts on mineral exploration, soil compaction, sod disturbance, and erosion. These activities are primarily carried out on existing roads and existing launch facilities and to a lesser extent along the cable routes. Erosion control procedures will be adhered to during any routine road or buried cable maintenance.
1462	Regarding soil erosion, how is the term "approximately original condition" defined and how will it be measured?	Approximately original condition refers to the restoration of such aspects as slope, soil compaction, and vegetation of the land surface prior to disturbance. Actual methodologies to measure this restoration have not yet been developed. However, all areas will be restored in compliance with state and federal regulations.
1463	Recommend that aggregate removal not take place directly in any aquatic or riparian locations.	It is not anticipated that aggregate will be supplied from sources that impinge on aquatic and/or riparian habitats. Where practical, these habitats will be avoided. If unavoidable, all appropriate steps will be taken to minimize any effect on the particular areas.
1464	There is no mention in the DEIS of erosion and sedimentation control in relation to the construction of new roads.	The discussion of soil erosion from proposed action and project element alternatives includes new road construction. The assumed mitigations presented in the FEIS for erosion control are directly applicable to any new road construction areas. For further information, please see Section 3.2.3.4 of the FEIS and Section 3.2.2 of the Final Geologic Resources EPTR.
1465	We estimate that aggregate requirements for the project in 1985, the peak year, would approach 20-percent of annual sand and gravel production in the region of influence. Additional work should be completed to determine whether the regions overall aggregate production capacity is adequate	A preliminary study to estimate the potential aggregate reserves and production capacity in the region of influence was performed subsequent to the DEIS. Production capacity of the vast reserves is hard to estimate. Producers interviewed report they are operating far below potential production

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	to meet both existing and project needs.	capacity levels and would be able and willing to expand both the number of months per year and the number of hours per day (shifts) they operate. These variables make it practically impossible to estimate what percentage of the annual sand and gravel production in the region of influence will be required during the peak construction period. However, the preliminary data do suggest that overall production capacity is sufficient to meet existing and project demand.
1466	What is your guarantee there will be no natural or induced tectonic activity in the silo area; who can predict when a fault will be active (or move)?	The art of earthquake prediction has not yet reached a state where one can say when a specific fault will experience displacement (movement). The best estimate is to classify faults based on their potential of producing an earthquake and the use of probability analyses and the determination of a recurrence interval to estimate how often to expect an earthquake to occur on a given fault. At this time, it is not possible to develop any type of accurate recurrence predictions on the Wheatland-Whalen Fault System because of the limited available data. A recent report by the Earth Technology Corporation verifies this by estimating the probability range as from one in one thousand to one in ten million. The DEIS has shown that based on highly conservative nuclear power plant siting criteria, a fault (the Wheatland-Whalen Fault System) within the Region of Influence can be conservatively classified as active, meaning, based on the available data, it is assumed that this fault is capable of generating an earthquake. The Air Force cannot guarantee there will be no natural tectonic activity within the Region of Influence for geological resources. Furthermore, the Air Force cannot control unrelated projects that could potentially initiate such tectonic activity. However, no tasks in the deployment of the Peacekeeper in Minuteman Silos project are anticipated to be capable of inducing an earthquake. Finally, should any induced seismic event occur within the Region of Influence, it is expected to have a maximum magnitude similar to and in the range of those induced events in the Denver and Casper

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		areas. Maximum magnitude of induced seismicity in these areas is about 5.3. For further information, please see Sections 2.6.1 and 2.6.2 of the Final Geologic Resources EPTR.
1467	Richter instrumental readings are the only reliable recording of quakes. The Modified Mercalli Intensity reports are subjective visual reports and therefore invalid.	The Modified Mercalli Intensity is a subjective report of an earthquake, but not invalid. In areas with limited seismic data, Modified Mercalli Intensities are a professionally accepted method to provide substantial additional information to the seismic data base. Furthermore, instrumental data is very limited for large portions of the western United States, including the southeastern Wyoming area. To report only Richter instrumental magnitude data would limit the data base and potentially underestimate the total historic seismicity of the region.
1468	If memory serves correctly, within the last 2 years there was an earthquake about 20 miles west of Cheyenne with a magnitude of about 4.	A thorough review has been made of earthquake epicenters tabulated through 1983 by the National Earthquake Information Center and the National Geophysical and Solar-Terrestrial Data Centur. The most recent seismic data have been collected subsequent to the DEIS and are included in the appropriate sections of the FEIS and Final EPTR. This data revealed no recorded seismic events within 30 miles of Cheyenne in the last 3 years. The only seismic event around magnitude 4.0 was recorded southeast of Casper, approximately 100 miles northwest of Cheyenne in February 1983.
1469	How complete and thorough is your knowledge of faults and quakes in the entire Region of Influence for geological resources?	Regional faulting and seismicity were reviewed throughout and beyond the Region of Influence for geologic resources. This review was based on an extensive search for all available literature, personal and telephone interviews with state and local geologists, and compilation of the most recent seismic data from two major sources, the National Earthquake Information Service (NEIS) and the National Geophysical and Solar-Terrestrial Data Center. The faults and seismicity considered directly pertinent to the safety of the Peace-keeper in Minuteman Silos project, such as the faults from the Preliminary Map of Young Faults in the United States by Howard et al. (1978), were

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		then further evaluated and presented in detail in the Geologic Resources Draft EPTR and summarized in the DEIS. For further information, please see Sections 2.6.1 and 2.6.2 of the Final Geologic Resources EPTR.
1470	Regarding the Bordeaux-Hyannis-North Platte Fault, the Air Force neither discusses the environmental impact nor explains the conclusion that seismic activity would not cause ignition.	Impacts by the project on the environment are discussed as direct project impacts in the Peacekeeper in Minuteman silos FEIS. In the case of impacts by geology (faulting and seismicity) on the project, it is discussed as a safety issue in the FEIS. The distance between the Bordeaux-Hyannis-North Platte Fault Zone and the Deployment Area (DA) is sufficient for the conclusion drawn because 1) there is no danger of surface rupture in the DA from this fault zone 2) the ground-shaking from an earthquake on the Bordeaux-Hyannis-North Platte Fault Zone, regardless of magnitude, would be sufficiently attenuated by the time it reaches the DA to pose no threat to the integrity of the components of the missile system.
1471	Safety of silos in T-Flight.	Please see Section 1.6.10.4.3 of the FEIS.
1472	Would the estimated seismic acceleration in a 50-year period at silo T-2 differ appreciably from the 0.04g figure cited for southeastern Wyoming, and if so, is it possible to provide a specific estimate applicable to silo T-2?	Subsequent to the DEIS, preliminary recurrence interval estimates have been determined based on available data. The recurrence intervals range from one in one thousand to one in ten million (The Earth Technology Corporation, 1983). The 0.04g seismic acceleration fits into this range.
1473	Are additional investigations warranted to determine the potential activity of the Wheatland-Whalen Fault zone near Silo T-2?	Since publication of the DEIS, the Air Force has, studied the possibility of seismic events within T-Flight. The results of this study are oulined in Section 1.6.10.4.3 in the FEIS. Further, the Air Force has also undertaken a more detailed study of the effects of such events upon the missile silo. Preliminary results are that no significant safety hazard is present. Our analysis has been based on the assumption that the fault system is active and no further activities are planned to further classify the fault.
1474	What ground acceleration was assumed in the design basis for construction of the silos, and	The design ground acceleration for the Minuteman silos controlled by F.E. Warren AFB is classified

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	particularly for silo T-2?	information. However, the design is sufficient to withstand the ground shaking caused by the maximum credible earthquake on the Wheatland-Whalen Fault System.
1475	Does Silo T-2 warrant additional reinforcement to withstand seismic activity?	Additional reinforcement of Silo T-2 is not required.
1476	Seismic evaluations based on probabilities in wide areas where recorded earthquakes have been few and brief are questionable.	The use of probabilistic analyses for evaluating seismicity is a standard method applied in areas of limited, instrumentally recorded seismic data. With the available data, more detailed, deterministic analyses are not practical for southeastern Wyoming.

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1477	The implementation of air traffic curfews at Cheyenne Airport would be contrary to current airport philosophy and policy and would be very difficult to enforce.	This has been eliminated as a mitigation measure.
1478	It would be impossible to relocate aircraft start-up, testing and taxiing areas at Cheyenne Airport so that they would not impact the adjacent area.	This has been eliminated as a mitigation measure.
1479	With the significant increase in population and equipment involved in the project resulting in heavier traffic and noise, how could the DEIS conclude that noise would have no impact on Cheyenne or Laramie County?	The noise impact analysis using standard and accepted analytic methodologies was based upon the increase in vehicular activity resulting from work force and population increase as well as construction activity. Comparision of noise effects between the No Action Alternative and Proposed Action resulted in the analytically sound conclusions that environmental noise impacts are predicted to be negligible and not significant. For further information, please see Section 3.2.4.4 of the FEIS and Section 3.5 of the Final Noise EPTR.
1480	Pertaining to the Nebraska deployment area, what will be the impact of noise level increases on wildlife in the Wildcat Hills State Recreation Area in Scotts Bluff County, domestic cattle, and rural residents?	Project-related noise effects in the Nebraska deployment area will be primarily associated with construction activities. These activities will be of short duration at any given location. Because of the general ability of wildlife to acclimate to construction and roadway noise, wildlife in Wildcat Hills Recreation Area is not expected to be impacted by any project-related increases in noise levels. There may be negligible increase in noise levels resulting from an increase in visitors. Domestic cattle, even range cattle that are handled infrequently, do not typically become spooked or stressed by normal highway noises other than possibly by emergency vehicle sirens. Where Peacekeeper deployment may occur within a pasture where cattle are present, the cattle may move a distance away until the period of direct activity has ceased. In all likelihood, their curiousity will cause them to return to the site following departure of the workers. Typical noises from cranes, trucks, and other deployment

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		equipment and activities will have no effects on the cattle. Quantitative analysis predicted that noise level increases due to transportation and construction-related activities will result in negligible, not significant impacts on the local population. For further information, please see Section 3.2.4.4 of the FEIS and Section 3.5 of the Final Noise EPTR.
1481	Will there be an increase in the use of Air Force helicopters and what will their impact on noise levels be? Are there ways to minimize their disturbances?	The Air Force presently flies about 2 1/2 helicopter sorties per day in support of Minuteman maintenance operations. It is projected that an increase of only 10 sorties per year will occur during the inital deployment of the Peacekeeper in Minuteman silos. This small increase in helicopter activity will result in negligible impact on average background noise levels.
1482	What is the basis for the conclusion that the noise level from construction activities and the use of construction equipment will be no different from that of existing general construction activities?	Standard available construction equipment and standard engineering and construction procedures will be used for all construction activities, which include building construction, roadway construction, and cable trenching. For further information on typical ranges of noise levels from general construction activities and construction equipment, please see Section 3.1.4 of the Final Noise EPTR.

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1483	A summary of the DEIS Air Quality impacts and mitigations as submitted by the Wyoming Department of Environmental Quality is provided.	Noted.
1484	Why didn't the fugitive dust impact analysis consider the transportation-related impacts which are discussed in the Transportation section of the DEIS?	Transportation-related impacts include lowering of levels of service, increased vehicular and Peacekeeper component traffic on rural unpaved roads, and roadway-related construction activity. Lowering of levels of service are applicable to urban area paved roads which are a minor source of fugitive dust. Fugitive dust impacts from traffic on rural unpaved roads and from roadway-related construction activity were evaluated. For further information, please see Section 3.2.5.4.2 of the FEIS and Section 3.5.2 and Appendices C and D of the Final Air Quality EPTR.
1485	What will be the effect of the fugitive dust on cattle grazing in pastures along the county roads? won't the dust on the grass cause their teeth to wear down faster resulting in weight loss and won't the cattle be subjected to more stress by the traffic and the dust?	It is possible that the initial increase in traffic could produce sufficient stress to cause cattle to move away from the road. From observation of the animals along busy highways, however, it may be expected that this stress will be only temporary until the cattle become accustomed to the vehicles. Since, under light winds, the larger particulates will be deposited close to the roadway with only a few carried beyond the plowed firebreaks, the effect on cattle teeth should be negligible. Under stronger wind conditions the particles will drop from the moving grass blades to the soil. Smaller dust particles in sufficient numbers could reduce the palatability of grass. Studies at Colorado State University, however, have shown that most of these particles are removed by the bumping of the grass blades by the cow's nose in the act of grazing. No reduction of plant growth by dust loading has been measured in research test plot studies.
1486	On the subject of air quality on county road travel; are you going to operate on county roads where they won't be dusty or do you consider this travel of no consequence?	The projected asphalt paving of sections of unpaved roads will reduce fugitive dust emissions. During silo modification and Peacekeeper installation, it is estimated that no more than perhaps 20 vehicles will be on any section of an unpaved

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		county road during a 24-hour period. During the operational period it may be expected that missile site traffic will involve only a few light duty maintenance vehicles (cars and pickup trucks) per week. Fugitive dust impacts from roadway construction activities were predicted to be well below regulatory standards. For further information, please see Section 3.2.5.4.2 of the FEIS and Appendices C and D of the Final Air Quality EPTR.
1487	People in agriculture and ranching who will be impacted by additional traffic on roads are aware of the dust caused by traffic. Dust is a problem. Suggest contacting the rangeland experts in the state and local expert in the county about that because there is significant dust especially during drought years. To say it is not significant is not correct.	Regional dust, particularly from wind blowing over bare fields and from certain farming activities during rainless periods continues to be a problem in the area of eastern Wyoming, western Nebraska and northeastern Colorado. However, the increment of dust which will be added by the vehicle traffic involved in the installation and operation of the Peacekeeper missile sites is not expected to be of any measurable quantity above existing background levels. Fugitive dust impacts from roadway construction activities were predicted to be well below regulatory standards. For further information, please see Section 3.2.5.4.2 of the FEIS and Appendices C and D of the Final Air Quality EPTR.
1488	What is the quantitative basis for concluding that the impact on regional visibility with respect to construction of any of the alternative road access routes, staging area (dispatch station) alternatives or cable route alternatives are negligible and not significant?	The visibility impact analysis adhered to the procedures as documented in the EPA's "Workbook for Estimating Visibility Impairment." Even though project-related sources, including F.E. Warren AFB, residential housing developments, dispatch stations, deployment area roads, cable paths, etc., were conservatively combined and treated as one worst-case source, the impact was negligible and not significant. For further information, please see Section 3.2.5.4.3 of the FEIS and Sections 3.1.3, 3.5.3 and Appendix C Section C.2 of the Final Air Quality EPTR.